

CAFII Executive Operations Committee Teleconference Meeting Agenda

Date: Tuesday, October 29, 2019

Location: Teleconference Only

Chair: M. Boyle

Time: 2:00 – 3:30 p.m. EST

Dial-in: 416-477-0921/514-447-8925/1-888-543-2249

Pin #: 1500

Item	2:00 p.m.	Presenter	Action	Document
1. Call to Order		M. Boyle		
2. Consent Items	2:02 p.m.	Presenter	Action	Document
a. Meeting Notes of September 24/19 EOC In-Person Meeting				✓
b. Regulatory Update				✓
c. Consultations/Submissions Timetable				✓
d. Committee Reports Addressing CAFII Priorities from October 1/19 CAFII Board Meeting				✓
e. Regulator and Policy-Maker Visit Plan				✓
f. Program for AMF 2019 Rendez-Vous Mini-Conference: Monday, November 25/19				✓
3. CAFII Financial Management and Governance Matters	2:05 p.m.	Presenter	Action	Document
a. Financial Statements as at September 30/19		T. Pergola	Update	✓
b. 2019 Fiscal Year Forecast as at September 30/19		T. Pergola	Update	✓
c. Draft Minutes of October 1/19 CAFII Board Meeting		K. Martin/B. Wycks	Approval	✓
d. Development of 2020 CAFII Operating Budget		K. Martin/B. Wycks	Update	
e. New Timetable for Finalization and Posting of CAFII Board and EOC Meeting Materials		B. Wycks/K. Martin	Update	
f. Board-Approved 2020 Schedule of CAFII Meetings and Events, Including New Date for Next CAFII Liaison Lunch and Industry Issues Dialogue with AMF Staff Executives		B. Wycks/K. Martin	Update	✓
g. Board-Approved Decision to Enhance the Benefits and Value Proposition of CAFII Associate Status		B. Wycks/K. Martin	Update	✓
h. Creation of An EOC Working Group to Explore A New Lower Dues Category of CAFII Membership		M. Boyle	Discussion	
i. Next CAFII Board Meeting and Guest Speaker at Ensuing Reception		B. Wycks	Update	✓
4. Recent and Upcoming CAFII Strategic and Regulatory Initiatives	2:35 p.m.	Presenter	Action	Document
a. October 28/19 CAFII Education and Dialogue Meeting with FCAC Staff Executives		B. Wycks/K. Martin	Update	✓
b. October 22-25/19 CAFII Western Canada Insurance Regulators and Policy-Makers Visits Tour		B. Wycks/K. Martin	Updates	✓
c. Board-Mandated External Counsel Legal Opinion on AMF Directive to Cancel and Remove Existing/In-Force Credit Protection Insurance Coverage from Non-Debtor Spouses		K. Martin/B. Wycks	Update/ Discussion	✓
d. AMF Review of Critical Illness Insurance		M. Boyle/K. Martin	Update	✓
e. AMF Position on Embedded Creditor's Group and Travel Insurance Coverages		K. Martin/B. Wycks	Update	✓
f. CAFII Credit Protection Insurance Industry Best Practices Working Group: Progress Report		M. Boyle	Update	✓
g. CAFII Opportunity To Take Over CBA's Quarterly CGI Benchmarking Study: RFP to Actuarial Firms on An Enhanced Benchmarking Study		K. Martin	Update	✓
h. CAFII 2019 Annual Stakeholder Meeting With CCIR: November 5/19		B. Wycks	Update	✓ (2)
i. FSRA Launch of Life and Health Insurance Sector Stakeholder Advisory Committee		K. Martin/B. Wycks	Update	✓
j. FCNB Plans to Develop an RIA Licensing Regime in New Brunswick, Including Changing Nomenclature/Terminology To "Incidental Sellers of Insurance Licensing Regime"		B. Wycks/K. Martin	Update	
k. CAFII Website Enhancements		K. Martin	Update	
5. Other Business	3:15 p.m.	Presenter	Action	Document
a. CAFII Registration As A Lobbyist: Federally And With Provinces/Territories, Particularly Quebec		K. Martin/B. Wycks	Discussion	✓ (2)
6. Tracking Issues		Presenter	Action	Document
a. BC 10-Year Review of Financial Institutions Act				
b. FCNB Insurance Act Rewrite; and Linked Plan to Introduce an RIA Regime				
c. AMF Consultation on Updating Sound Commercial Practices Guideline				
d. Alberta Government Plans to Create a Single Financial Services Regulator				
e. FCAC: Phase 2 of Domestic Bank Retail Sales Practices Review				

Next EOC Meeting: Tuesday, November 19/19, 2:00 – 4:30 p.m., Canada Life Assurance, 330 University Avenue, Hamilton Meeting Room (First Floor), Toronto

Next Board Meeting: Tuesday, December 3/19, 2:00 to 5:00 p.m., TD Conference Centre, 55 King St. West, Concourse Level, Toronto

CAFII Executive Operations Committee Meeting

Tuesday, September 24, 2019

Held at CIBC Insurance

9th Floor Boardroom, 18 York St. Toronto, ON

MINUTES

EOC Present:

Martin Boyle, BMO Insurance *Chair*
Peter Thorn, TD Insurance
Tony Pergola, ScotiaLife Financial *Treasurer (by teleconference, for part)*
Monika Spudas, Manulife Financial *(by teleconference)*
Sharon Apt, Canada Life Assurance
Joanna Onia, CIBC Insurance
Scott Kirby, TD Insurance *(by teleconference)*
Dana Easthope, Canadian Premier *(by teleconference)*
Anita Mukherjee, RBC Insurance *(by teleconference)*
Michelle Costello, CUMIS *(by teleconference)*
Brad Kuiper, Scotialife Insurance *(by teleconference)*
Michele Jenneau, National Bank Insurance *(by teleconference)*
Andrea Stuska, TD Insurance
Isabelle Choquette, Desjardins *(by teleconference)*
Kamana Tripathi, TD Insurance *(by teleconference)*
Rob Dobbins, Assurant
Casandra Litniansky, CUMIS *(by teleconference)*

Also Present:

Natalie Hill, Managing Matters *Recording Secretary*
Keith Martin, CAFII *Co-Executive Director*
Brendan Wycks, CAFII *Co-Executive Director*

1. Call to Order

The meeting was called to order at 2:05 p.m.; M. Boyle acted as Chair; N. Hill acted as Recording Secretary.

2. Consent Items

- 2. a. Meeting Notes of August 13/19 EOC Teleconference Meeting
- 2. b. Summary of Board and EOC Action Items
- 2. c. Regulatory Update
- 2. d. Consultations/Submissions Timetable
- 2. e. AMF Save the Date Notice Re 2019 Rendez-Vous Mini-Conference: Monday, November 25/19

3. CAFII Financial Management and Governance Matters

- 3.a. Financial Statements as at August 31/19
- 3.b. 2019 Fiscal Year Forecast as at August 31/19

Treasurer Tony Pergola presented the CAFII financial statements as at August 31/19, noting that the Association was tracking quite well to budget, with only some minor timing differences.

He also presented a forecast to the end of the 2019 fiscal year, based on actual results as at August 31/19.

3. c. Preliminary CAFII 2020 Operating Budget, and Committee Funding Requests

A very preliminary 2020 budget has been prepared by Tara Moran, and will be tabled at a future EOC meeting.

3. d. New Approach/Format for October 1/19 CAFII Lunch/Industry Issues Dialogue with AMF Executives

B. Wycks updated the EOC on the discussions that have been in progress with the AMF's Frederic Perodeau to develop a new approach to the lunch and industry issues dialogue with them. Mr. Perodeau indicated that he wanted a much less formal lunch, and for the Industry Issues Dialogue to also be less formal and not consist solely of asking questions of the AMF.

CAFII had proposed a new format that met these expectations, and Mr. Perodeau had responded that he supported the new approach, but that because some AMF staff executives had not reserved the 1 October, 2019 date in their calendars, they were no longer available, and the AMF would therefore need to reschedule.

Keith Martin spoke on 24 September, 2019 to Mr. Perodeau on the phone in French, and Mr. Perodeau asked for CAFII not to "read anything into the request for a rescheduling," and that the AMF would like to reschedule as soon as possible. It was agreed that options for a rescheduled meeting with the AMF will be discussed at the upcoming 1 October, 2019 Board meeting.

3. e. Proposed CAFII 2020 Board and EOC Meeting Dates and Updates Member Board Hosting Rotation

B. Wycks tabled a proposed 2020 schedule of CAFII meetings and events. Members who are slated to host events were asked to review this with their Board member and confirm that they are comfortable with the proposed schedule as soon as possible.

3. f. CAFII membership and Associate Status-Related Matters

3. f. i. Proposal to Enhance The Benefits/Value Proposition Of CAFII Associate Status

B. Wycks noted that a proposal was brought to the June EOC teleconference meeting, but was postponed at that time, as that meeting was running overtime. There has been considerable churn in the Associate category, and part of the reason why is that it is an expensive proposition to pay \$4800 per annum for essentially the opportunity to attend four CAFII receptions/events annually (three receptions following Board meetings, and the Annual Members Luncheon once a year).

CAFII management has been exploring ways to enhance and enrich the value proposition for Associates, and one suggestion is that the monthly Regulatory Update could be made available to Associates, providing them with some interesting insider information on developments in the industry.

The EOC agreed that this could be valuable to Associates, without diluting significantly the existing value that full dues paying members receive. The EOC supported moving forward on this initiative.

3. f. ii. Proposal To Create A New Category Of CAFII Membership

B. Wycks introduced a proposal to offer smaller potential CAFII members a larger reduced “Initiation Membership” fee which, over time, would increase to the appropriate upper or lower member dues.

However, in discussion, doubts were expressed about whether that would be fair to Initiation Members who paid the higher fees, and whether a considerably smaller-sized potential member would be enticed by an offer that eventually required them to pay fees at the same level as much larger companies.

It was agreed that the concept of investigating a new tier of membership at a lower fee level be raised at the upcoming October 1/19 Board meeting, with the Board asked to support the creation of an EOC Working Group which would investigate this possibility and ultimately report back to the Board with a recommendation.

4. CAFII Regulatory and Other Initiatives

4. a. CAFII Follow-Up Letter to AMF on Spousal Coverage Issue

K. Martin noted that the AMF has not supported CAFII’s arguments on why CAFII members should be able to continue to offer spousal insurance, and that CAFII members have submitted Action Plans to the AMF on how they will either be consistent with the AMF’s expectations around the creditor’s demonstrating a pecuniary interest in the life and/or health of a non-debtor spouse, if such spousal insurance is offered, or otherwise cease to offer such spousal insurance going forward.

However, subsequently the AMF has indicated, to the surprise of CAFII and its members, that it expects the industry to bring existing, in-force policies into conformity with its expectations, and to submit Action Plans on how it will do this by 1 October, 2019. CAFII therefore sent the AMF a letter formally requesting an extension of this deadline for submission of Action Plans. Resulting from the CAFII letter, Nathalie Sirois from AMF spoke with CAFII Co-Executive Director Keith Martin in French on 23 September, 2019 and agreed to a one-month extension; K. Martin requested at least a two-month extension, and Ms. Sirois said she would respond shortly with a written response.

There was considerable discussion about the AMF’s challenging and unco-operative approach on a number of files, and the implications for CAFII members, including how best to respond.

4. b. Possible CAFII Approach To AMF Re Whether A Fact Sheet and Summary Document Will Be Required Under RADM Regime For Insurance Coverages Embedded As A Credit Card Feature/Benefit

K. Martin noted that the CLHIA had shared with CAFII recently that they had learned from the AMF that the AMF expected that all embedded credit card coverages will require a fact sheet and summary document, a position the industry does not agree with and will find onerous to implement. The EOC requested that this matter be further investigated, including how the communication was shared with the CLHIA and by whom, with the intention to discuss further if and how CAFII should respond to this development with the AMF.

4. c. AMF Review of Critical Illness Insurance

M. Boyle updated the EOC on the recent AMF delivery of two surveys on critical illness insurance to 16 global insurers and 10 Quebec-based insurers. Included in the questionnaires are questions that will allow the AMF to determine loss ratios, which is an issue they have increasingly focused attention on.

4. d. CAFII Credit Protection Insurance Industry Best Practices Working Group: Update and Next Steps

M. Boyle provided an update on the work of the CAFII Working Group on Credit Protection Insurance Industry Best Practices, which had been meeting weekly for the past six weeks. The Working Group is reviewing regulatory expectations with a view to identifying where the industry can try to enhance how it meets those expectations. The Working Group will continue its work and is expected to be in a position to provide a debrief on progress made to the Board on 1 October, 2019, and to provide a more detailed update at the 3 December, 2019 Board meeting. The Working Group anticipates completing its work early in 2020.

4. e. Yukon Licensure Issue Re: Sales of Credit Protection Insurance

K. Martin provided an update on a communication from Bradley Rowett from the office of the Yukon Superintendent of Insurance, who was surprised that 10 particular insurers which did not have a Yukon “life license” had not recently applied for one. K. Martin confirmed that all CAFII insurer members did have a Yukon life license, and that the firms in question were not CAFII members. The CLHIA agreed to take on this conversation with Mr. Rowett, who was so advised. While this indicates that Yukon still has some areas of confusion about the life and health insurance sector, the tone of the communications also indicated that Mr. Rowett and his colleagues appear very committed to trying to rectify the confusion that was caused by the Yukon’s earlier directives on credit protection insurance licensure in their Territory.

4. f. CAFII 2019 Annual Stakeholder Meeting With CCIR: November 5/19

B. Wycks confirmed that CAFII’s 2019 Annual Stakeholder Meeting with CCIR will be on 5 November, 2019, and that this year it will focus on providing feedback on a preliminary draft of CCIR’s 2020-2023 Strategic Plan. Mr. Wycks notified Tony Toy that CAFII would have preferred a more wide-ranging discussion, but he was assured that the focus on the strategic plan would still afford the ability to discuss an array of industry issues.

4. g. CCIR/CISRO Fair Treatment of Consumers Working Group: Fall 2019 Meetings With Stakeholders

The CCIR/CISRO Fair Treatment of Consumers Working Group’s Fall 2019 meetings with industry stakeholders will focus on insurer and MGA groups; and, as such, CAFII has been notified that we will not be participating in this round of discussions. Since these meetings often were difficult to manage, as CCIR/CISRO expected concrete examples of how our members were implementing the “Guidance: Conduct of Insurance Business and Fair Treatment of Customers” when specific examples could be difficult to provide, CAFII management advised that being granted a “pass” on the Fall 2019 set of meetings should not be a concern.

4. h. FSRA Launch Of Life and Health Insurance Sector Stakeholder Advisory Committee

FSCO previously had a life and health insurance advisory group that K. Martin represented CAFII on; this has now been disbanded with the transition from FSCO to FSRA. K. Martin recently received a phone call from Swati Agarwal, who has moved as a manager from FSCO to FSRA, advising him that a new FSRA Advisory Group on Life and Health Insurance will be created, and she invited Mr. Martin to participate on behalf of CAFII.

Ms. Agarwal also asked for a follow-up phone call to discuss FSRA and CAFII priorities. A very constructive discussion was held on 18 September, 2019 at which Ms. Agarwal indicated that FSRA's priorities would include harmonization of regulations, improved licensing efficiency, a greater focus on the practices of MGAs, and a continued emphasis on the fair treatment of customers. Mr. Martin indicated that CAFII priorities included clarity around the expectations on the fair treatment of customers, noting that CAFII members can attempt to determine eligibility for products but are not allowed to offer advice and, as such, cannot determine suitability of products for customers; a continued commitment to harmonization; a continued commitment to principles-based, risk-based regulation; a view that FSRA should play a leadership role in CCIR, CISRO, and international insurance regulation organizations such as the International Association of Insurance Supervisors; a recommendation that at least one member of the FSRA board should have an expertise or background in life and health insurance; and the importance of FSRA looking to create regulatory sandboxes to allow new, innovative players to experiment in product or distribution innovation without the burden of the full regulatory regime placed upon them in doing so.

4. i. CAFII Opportunity To Take Over CBA's Quarterly CGI Benchmarking Study

K. Martin provided an update on the possibility of CAFII taking over a now discontinued Canadian Bankers Association (CBA) quarterly benchmarking study on creditor's group insurance. One CAFII Board member had doubts about the value of this benchmarking study, given that in the past it had not produced "apples-to-apples" output; and that CAFII Director was also concerned about a study that focused on sales and penetration at a time of increasing regulatory scrutiny. Another Board member felt that if all CAFII financial institution members did not participate, this study would not be of value. As a result, the RFP on the study was not distributed to potential actuarial firm bidders, so as to allow for a fulsome discussion on these matters at the upcoming 1 October, 2019 Board meeting.

4. j. CAFII Outreach To FCAC For Credit Protection Insurance Education and Dialogue Meeting With Judith Robertson, Commissioner, and Staff Executives

Mr. Wycks noted that CAFII had sent a congratulatory letter to Judith Robertson, in her new role as Commissioner of the Financial Consumer Agency of Canada, on July 29/19 and planned to follow-up with her office shortly, requesting the opportunity to meet with her and her colleagues in Ottawa, likely with a small delegation of CAFII member representatives.

4. k. Itinerary, Delegation, and Agenda for CAFII Fall 2019 CAFII Western Canada Tour: October 21-25/19

Mr. Wycks provided an update on the upcoming CAFII 2019 Western Canada insurance regulators and policy-makers visits tour, which will take place from 21-25 October starting in Manitoba, and working west through Saskatchewan, Alberta, and British Columbia.

Between five and seven CAFII member representatives are expected to join the tour with the two CAFII Co-Executive Directors, and a full set of meetings with key regulators has now been nearly finalized.

4. l. 2019 THIA "Innovation Summit" and Annual General Meeting: September 9-10/19

K. Martin and B. Wycks attended THIA's "Innovation Summit" on 9 September, 2019, and the THIA Annual General Meeting on 10 September, 2019; and they provided an update on those meetings.

5. Committee Updates

5. a. Research & Education

K. Martin noted that due to the delays in releasing the Pollara consumer research on mortgage and HELOC credit protection insurance, and due to some CAFII financial pressures, the 2019 CAFII research budget was not spent. However, research remains a commitment for CAFII and the Research & Education Committee will be requesting a 2020 budget of \$50,000.

5.b. Market Conduct

No update was required beyond the regulatory issues already discussed in the meeting.

5. c. Media Advocacy

K. Martin noted that a series of website enhancements will be shortly released, including three new videos, a visually-pleasing version of the executive summary of the Pollara consumer research on mortgage and HELOC credit protection insurance, and new vignettes that provide a storyline explaining CAFII products.

5. d. Licensing Efficiency Issues

B. Wycks provided an update on the FCNB's plans to develop an RIA licensing regime in New Brunswick, including CAFII's opposition to the possible use of the term "incidental sellers of insurance licensing regime."

5. e. Travel Medical Insurance Experts

B. Wycks reported that the CLHIA had recently hosted a meeting with the Ontario Ministry of Health on its plans for implementing the now confirmed decision to stop providing out-of-country travel medical insurance coverage for Ontarians effective January 1, 2020.

5. f. Networking & Events

5. f. i. Speaker for December 3/19 CAFII Reception: Melissa Carruthers, Monitor Deloitte

K. Martin reported that Melissa Carruthers, a consultant at Deloitte Monitor, gave an excellent speech on insurance trends at the September 9/19 THIA Innovation Summit – which led him and Mr. Wycks to investigate having Ms. Carruthers as a speaker at the reception following the 3 December, 2019 CAFII Board meeting. Ms. Carruthers has accepted CAFII's invitation and will speak at that reception.

6. Other Business

6. a. Stikeman Elliott Advice Re CAFII Co-Executive Director Registration As A Lobbyist: Federally And With Provinces/Territories

Mr. Wycks advised that Stikeman Elliott had just delivered to CAFII, on September 23/19, an analysis of whether CAFII's Co-Executive Directors should register as lobbyists in the various federal and provincial/territorial jurisdictions across the country. It was therefore agreed that the two documents received would be tabled and discussed at a future EOC meeting.

6. b. Results of Survey Monkey Evaluation Feedback on EOC Teleconference-Only Meetings

N. Hill presented the results of the surveys conducted recently about EOC Meetings. It was agreed that further surveys should be conducted to get a larger sample size, and the results could be more fully discussed in a future EOC meeting.

7. Adjournment

There being no further business, the meeting was terminated at 4:01 p.m.

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Regulatory Update – CAFII Executive Operations Committee, October 18, 2019

Prepared By Keith Martin, CAFII Co-Executive Director

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Federal/National

Travel and Health Insurance Association (THiA)

THiA Organizes an Update on Travel Insurance Imbedded in Credit Cards in Quebec

THiA is organizing an update for its members on travel insurance embedded in credit cards in Quebec, a topic that has generated some confusion around whether such coverage requires a factsheet and summary. The invitation states: "THiA's Regulatory Affairs Committee invites you to join a discussion about travel insurance products embedded in credit cards in Quebec and recent related regulatory developments. The discussion will be led by Rick Da Costa Chair of THiA's Regulatory Affairs Committee and Jill McCutcheon, THiA's Legal counsel." The session will take place on Oct 24, 2019 from 10am-11.30am, by webinar. CAFII's Travel Medical Insurance Working Group Chair Afzal Baig of Toronto Dominion Insurance will try to attend, and his summary of the meeting will be shared with EOC members at the next EOC teleconference meeting on 29 October, 2019.

KPMG

KPMG Program Released for Annual Insurance Conference

KPMG has released its preliminary program for its annual insurance conference, to be held on 28 November, 2019 at the Metro Toronto Convention Centre. Topics will include regulatory and technology change, open data exchange, Insurtech, women leaders in insurance, and will include comments by Neville Henderson, Assistant Superintendent, Insurance Supervision Sector, OSFI.

Insurance Business Canada Awards Gala

Brendan Wycks, CAFII Co-Executive Director, is Among the Prestigious Group of Insurance Executives Selected as Jurists

The Insurance Business Canada Awards finalists have been announced, along with the jurists who will decide on the winners. Among the panel of jurists is CAFII's Co-Executive Director Brendan Wycks, who will join a prestigious group of insurance industry leaders as a jurist. The awards recognize excellence in the Canadian insurance industry, culminating in a ceremony at a gala event on 28 November, 2019 in Toronto.

Provincial/Territorial

Alberta

Alberta Insurance Bureau

Anthonet Marmieri Has Left the Alberta Insurance Council

CAFII has learned that Anthonet Marmieri has left the Alberta Insurance Council. No replacement is listed on the AIC site, with the following listed as the Executive Team: Joanne Abram, Chief Executive Officer, Edmonton; Carolyn Janz, Chief Financial Officer, Edmonton; Sylvia Boyetchko, Director of Licensing, Edmonton; Heath Young, Director of Information Technology & Business Services, Calgary; Zabeda Yaqoob, Director of Legal & Regulatory Affairs, Calgary; and Sharan Dhalla, Director of Compliance, Calgary.

Ontario

Financial Services Regulatory Authority of Ontario (FSRA)

FSRA Announces New Stakeholder Advisory Committees

On 27 September, 2019 FSRA announced that it was launching applications for membership in six Stakeholder Advisory Groups (SACs), which will act as consultative bodies to the FSRA Board of Directors on FSRA's priorities, budget, and other matters the Board deems appropriate. FSRA's release states that

They will play an important role in fulfilling our commitment to an open, transparent and collaborative approach that involves stakeholders and ensures broad input and perspectives as we work to deliver our mandate under the Financial Services Regulatory Authority of Ontario Act, 2016.

The SACs will build on the work of the Industry Advisory Group (IAGs) that supported FSRA's 2019 launch. They will also replace similar consultative groups that existed at FSRA's predecessor FSCO. CAFII was represented on that consultative group and has been invited to participate in the Life and Health Insurance SAC.

FSRA Releases its Second Newsletter

FSRA has released its October, 2019 newsletter. In it, FSRA CEO Mark White states that “It has been four months since the Financial Services Regulatory Authority’s official launch and, while there have been challenges, we are pleased with our progress.” Glen Padassery, Executive Vice President, Policy and Chief Consumer Officer, notes that “We will be establishing a Consumer Advisory Panel (CAP) to guide FSRA’s Consumer Office in the development of its strategies and the execution of its work across all of the regulated sectors. The CAP’s input will help to inform FSRA’s approach to understanding different public interest perspectives and its related activities, including consumer-based research, policy support and consumer outreach.” The deadline for applicants to join the CAP is 14 November, 2019.

The Newsletter states that FSRA will attempt to provide greater clarity around guidance it provides to industry, noting that

FSRA will propose four distinct types of guidance to support requirements set out in legislation, regulations and rules and to inform stakeholders about FSRA’s approach to supervision and regulation:

- 1. Interpretation: Sets out FSRA’s view of requirements under law (i.e. legislation, regulations and rules) so that stakeholders are aware of when non-compliance may lead to enforcement or other supervisory action.*
- 2. Information: Indicates FSRA views on topics affecting regulated sectors, such as desirable or undesirable practices or public interest concerns, without creating or interpreting the obligations of regulated persons.*
- 3. Approach: Describes FSRA’s internal principles, processes and practices for performing regulatory duties, taking supervisory action or exercising FSRA’s discretion or other regulatory powers.*
- 4. Decision: Sets out FSRA’s rationale for a specific regulatory decision of precedential value for other parties not involved in the specific matter.*

Quebec

Authorité des marchés financiers

AMF Organizes Conference on Regulatory Developments and Practices

The Autorité des marchés financiers, in collaboration with the Chambre de la sécurité financière, is organizing a series of five conferences in different cities in Quebec on regulatory developments and practices. The three hour conferences are intended to explain the inspection methods used by the AMF, to present tools to conform with Quebec regulations, and to provide updates on recent regulatory developments. Further information can be found at <http://app.dialoginsight.com/T/OFSYS/SM2/53/2/S/F/4186/17019/vWKLphJc/742480.html>

Program Released for Annual AMF Rendez-Vous

The Autorité des marchés financiers has released its program for its annual rendez-vous, to be held in Montreal on 25 November, 2019. CAFII and many of its members will be in attendance. The conference opens with a speech by Louis Morisset, President and CEO of the AMF, and will include remarks by J. Mark Weber, Eyton Director of the Conrad School of Entrepreneurship & Business, University of Waterloo, who will speak on the issue of confidence. The keynote address will be made by Quebec Minister of Finance Eric Girard. There will also be workshops on open banking, on dealing with natural catastrophes, on artificial intelligence, and on consumer protection.

Nova Scotia

Superintendent of Insurance, Nova Scotia

Nova Scotia Appoints New Superintendent of Insurance: William Ngu Retires

In a September 2019 liaison phone call with CAFII's Brendan Wycks, Tony Toy, Canadian Council of Insurance Regulators (CCIR) Policy Manager, advised that William Ngu had retired as Nova Scotia's Superintendent of Insurance in Spring 2019; and the province had subsequently appointed Paula Boyd as his successor. Mr. Ngu served as Superintendent of Insurance since 2015 and CAFII enjoyed several productive interactions with him over the past four years.

Ms. Boyd now adds the role of Superintendent of Insurance to her previously held Superintendent of Pensions responsibilities; and she is also Nova Scotia's CCIR representative.

Jennifer Calder continues to serve as Nova Scotia's Deputy Superintendent of Insurance and as the province's representative on the Canadian Insurance Services Regulatory Organisations (CISRO).

Newfoundland and Labrador

Superintendent of Insurance, Newfoundland and Labrador

Craig Whalen Retires As Deputy Superintendent of Insurance: Renee Dyer Is Newfoundland and Labrador's New Superintendent Of Insurance

In a September 2019 liaison phone call with CAFII's Brendan Wycks, Tony Toy, Canadian Council of Insurance Regulators (CCIR) Policy Manager, advised that Craig Whalen had just retired in September after a long tenure as Newfoundland and Labrador's Deputy Superintendent of Insurance and many mutually beneficial interactions with CAFII over the years.

In July 2018, Renee Dyer was appointed Director of Newfoundland and Labrador's Financial Services Regulation Division – in which capacity she serves as Superintendent of Insurance, Real Estate, Mortgage Brokers, Securities, and Pre-Paid Funerals. She is responsible for administration and enforcement of the Insurance Act, Securities Act, and the Real Estate Trading Act.

Before joining the Government of Newfoundland and Labrador, Ms. Dyer held progressively more responsible roles in a number of industries over the past 25 years. She worked at CIBC Corporate Office in Toronto as a Wealth Management Strategist; at CUMIS Insurance as a Senior Management Consultant; at Johnson Insurance as Vice President - Consulting and Plan Benefits; and at FIT For Work as Vice President - Operations.

Ms. Dyer earned Bachelor of Commerce and Master of Business Administration degrees from Memorial University in St. John's; and subsequently achieved the Certified Management Consultant (CMC) designation.

International Developments, Research, and Thought Leadership

Financial Conduct Authority

UK Regulator, the Financial Conduct Authority, Says that UK Banks May Fail to Meet the Timetable for Loan Insurance Claims

Reuters reports on 16 October, 2019 that the UK regulator, the Financial Conduct Authority, says that Britain's banks may not be able to deal with their remaining complaints about mis-sold loan insurance until next summer. Banks had hoped to draw a line under a decade-long scandal by the end of this year.

Loan insurance, or payment protection insurance (PPI), is Britain's costliest retail financial scandal. Banks have paid out more than 43 billion pounds (\$54.64 billion US) in compensation so far. "We are aware that the volume of PPI checking enquiries and complaints sent to firms increased significantly during August 2019 in the run-up to the complaints deadline on 29 August," the FCA said in a statement.

Banks have said they received hundreds of thousands more complaints than they expected in August. "As a result, firms will not be able to meet their normal complaint handling times," the FCA said. A number of firms have said that customers may not get a final response to their claim until summer 2020, the watchdog said.

"We are challenging firms to deal with these complaints as quickly as is reasonable, given the very large volumes," the FCA said. Claims will be entitled to interest on the amount due, typically 8%, which will include the length of time it took to respond.

Australian Securities and Investments Commission

ASIC Vows to Use New Powers to Protect Consumers

The Guardian reports that the Australian Securities and Investments Commission (ASIC), which regulates insurers, will use new powers to better protect customers. In a move welcomed by consumer advocates, ASIC said that rather than relying on ordinary Australians to make a rational choice based on the often voluminous disclosure documents that accompany financial products, it would now use new powers to make sure finance companies did the right thing.

In particular, ASIC claims that disclosure is not sufficient to protect consumers, and that "more often than not disclosure can be ineffective and can even backfire."

ASIC said its new approach drew on commissioner Kenneth Hayne's [final report](#) following his inquiry last year into the banks. More than 50 of Hayne's recommendations related to making firms behave better, rather than providing consumers with more information. "From ASIC's perspective, the limits of disclosure are not new, but we're now in a world where the Royal Commission report proved more than a tilt away from disclosure," she said.

Following six years of scandals in the finance sector, and continual criticism of it as a do-nothing regulator, the government has given ASIC significant new powers and it has pledged to adopt a more aggressive approach to enforcement.

The regulator's new weapons include the power to ban products, the product intervention power, which it has already used four times in the past three months, and a design and distribution obligation that comes into effect in April 2021.

This will require financial services companies to create products that are useful to a particular set of consumers and market it to them appropriately, rather than selling useless products to people as some have done with services such as junk insurance. Chester said the new law encapsulated "just common good business sense".

“I really think that’s got the potential to be a game changer for not only consumers but also the firms and their boards,” she said. “Going forward they’ll now need to meet these obligations to say that the products you’re offering to your consumers, to your market, are fit for purpose.”

“I think business is already on notice from us. It’s clear that when we see and substantiate significant consumer detriment we can and will act.”

A consumer advocate said consumers were forced to buy products such as insurance or a home mortgage but it was “impossible for any normal rational person who has a life to choose”. “Nobody reads terms and conditions,” she said. “Even when you try simplified disclosure, because you’re dealing with fundamentally complex products, people don’t make good choices.”

“What we need is better products and better conduct.” He called on the government to resist industry’s lobbying for light-touch regulation following the Hayne Royal Commission. “This report makes it clear that we need strong legislation that goes to the heart of the conduct revealed before the Royal Commission,” he said. “Letting the industry get away with pushing responsibility onto consumers through more disclosure won’t cut it.”

Australian and New Zealand Institute of Insurance and Finance (ANZIIF)

Australian and New Zealand Institute of Insurance and Finance Launches Working Group on “Raising the Standards”

The Australian and New Zealand Institute of Insurance and Finance (ANZIIF) and a working group of life insurers are establishing a framework to help lift professional standards across the life insurance industry.

The Life Insurers Professional Standards Working Group includes AIA, AMP Life, BT Life, ClearView, MLC Life, TAL and Zurich. They hold 95% of the gross written premium (GWP) in the life industry in Australia and New Zealand. The Australasian Life Underwriting and Claims Association is also involved.

The framework will determine the different “job families” and competencies needed to fulfil job roles at every level of experience. It will also help insurance CEOs to understand what investment is required to build professional skills within the company. ANZIIF has been working with insurers on the framework over the last two years.

To aid in the establishment of better standards, ANZIIF is planning a demographic survey to understand what level of background and skills industry employees possess, followed by another to develop a knowledge-based assessment within the framework.

AIA CEO Damien Mu told insuranceNEWS.com.au the framework will involve taking a closer look at the capabilities they needed across claims, underwriting, product and distribution, which “require a high level of engagement with customers.”

“The framework will present a great opportunity for our people to continue expanding their professional capabilities and we will continue to assist them in meeting and maintaining professional standards, so we’re able to deliver the best outcomes for our customers,” he said.

According to ANZIIF, the program will improve the professionalism of the life insurance industry, build community confidence in life insurance and create a better experience for customers. It will also improve strategies to attract and retain career employees.

It says the Hayne Royal Commission exposed a need to “place emphasis and investment into building the professional skills of people in life insurance.”

Opinion Piece by Ermanno Pascutto, Founder and Executive Director of FAIR Canada (Foundation for Advancement of Investor Rights)

The Slow Death of Canada’s Banking Ombudsman

Ermanno Pascutto writes that for several years, the federal government has failed Canadian retail consumers and small business in providing access to justice in banking, including for seniors, who have comprised 38% of ombudsman banking complaints.

He notes that the Ombudsman to Banking Services and Investments (OBSI) “was created more than two decades ago by Canada’s largest banks as a national, independent and not-for-profit organization to resolve consumer disputes, in order to get ahead of the federal government before it went ahead with enacting a statutory ombudsman. OBSI was created initially for the resolution of banking complaints and its mandate was expanded to include investments.”

Mr. Pascutto says that OBSI, the only independent referee and dispute resolution service for consumer and small business complaints with banks, has slowly been abandoned by most of the big Canadian banks. “Consumers are forced to hope that they will be dealt with fairly and impartially by a for-profit dispute resolution service provider paid for by the banks. The Montreal Canadiens would never be happy about the Toronto Maple Leafs choosing and paying the ref for any game, but this is effectively what the banks are doing to consumers, except that banking consumers are worse off than hockey players. They are amateurs with no home game, always playing in the bank’s arena, against the bank’s staff, and in front of the bank’s referee.”

He goes on to say:

Since OBSI's inception, something went wrong and the largest Canadian banks abandoned OBSI, replacing it with their own for-profit dispute resolution service, hired and paid for by each bank. OBSI's relevance has been dying at the hands of most of the same big banks that first established OBSI two decades ago. The federal government sees this happening, and hasn't done anything about it. To the credit of the securities regulators, the Canadian Securities Administrators, led by the Ontario Securities Commission, refused to permit the same thing to happen in investments: the regulator prevented banks, insurance companies and other dealers from abandoning OBSI for dispute resolution in investments.

It certainly was not that OBSI was awarding too much compensation to consumers that caused the big bank mass exodus. The banks have never paid \$1 million in aggregate for an entire calendar year, which is less than a "rounding error" or one month's compensation of a big bank CEO. So the only logical inference to be drawn is that OBSI was a little too independent for the big banks' liking. Some of its "too independent" behaviour may have included such OBSI practices as investigating problems discovered in complaint accounts that the customer didn't themselves identify. Financial services industry members did not like this practice, but OBSI has said it is consistent with the practices of other financial services ombudsmen around the world.

An external bank ombudsman's role is to investigate unresolved consumer complaints independently and recommend appropriate settlements. Banking complaints from retail consumers and small business (everyday Canadians) that require dispute resolution include excessive fees for prepayment of mortgages, fraud and missing and stolen funds. Investment-side complaints include high-risk investments that the consumer didn't understand, unexpected fees, predatory practices, unsuitable investments that consumers can't sell in times of crisis, fraud and problems with joint accounts and powers of attorney.

Seniors are particularly vulnerable, because of challenges such as physical or cognitive impairments, insufficient time horizon to replenish capital losses or death of partners who traditionally managed the finances. More than 38% of OBSI banking complainants are over age 65, and many are low income. They often need extra assistance and focused attention, which is more likely to be available from an independent non-profit ombudsman than a dispute resolution service provider that is focused on its bottom line.

Canadians, including the especially vulnerable seniors who need extra support and protection, need a statutory ombudsman that is independent from the banks. They need a statutory ombudsman to recommend solutions in cases that are big enough to warrant concern, but too small to be dealt with through the courts or too expensive to be dealt with through the courts for the average Canadian.

Increasingly irrelevant in banking, OBSI should recognize its inevitable and slow death at the hands of the big banks, announce that it will cease to act for any bank at a chosen date in the near future and inform Canadians that the big banks have killed the only independent ombudsman for consumer banking complaints.

The federal government should explain to Canadians why it has failed to create a statutory banking ombudsman with binding authority to protect bank customers and instead has allowed the banks to set up OBSI and then failed to protect OBSI when the banks turned against it. The federal government should inform the public whether any explanation exists besides the unwillingness of any Minister of Finance, in the last decade, to stand up to the banks.

Canada's banking system is among the best in the world and Canadians have a high degree of confidence in the sector. What drives that confidence is consumers' trust in government policies to protect our banks, ensuring the stability of the sector, and ensuring fair treatment of consumers. The current ombudsman problem is bad for consumers and bad for consumer confidence in banks.

It's time for the federal government to publicly commit on a timely basis to a statutory banking ombudsman, not just to protect Canadians – especially seniors and other vulnerable Canadians – but to safeguard public confidence in one of our most important industries and to ensure that the confidence is justified.

Appendix A

CAFII Alerts 13 June 2019—18 October 2019

Date of Email Alert	Topic of CAFII Alert
25 June 2019	Federal Minister of Finance Appoints Judith Robertson, Current FSRA Board Member, As Commissioner Of The Financial Consumer Agency of Canada (FCAC)
22 July 2019	CCIR Communique, Summer 2019
24 July 2019	Submitting "Request For Approval To Keep Records Outside Saskatchewan" To Financial and Consumer Affairs Authority (FCAA)
24 July 2019	Feds criticize Ontario government's plan to eliminate out-of-country health insurance coverage
2 August 2019	July 29/19 Interview With Libby Znaimer, Zoomer Radio On Elimination of OHIP Out-of-Country Medical Coverage
6 August 2019	Australian Securities and Investments Commission (ASIC) Publishes Critical Report on Credit Protection Insurance
8 August 2019	FW: Letter from Lynn Guerriero, OHIP Division, MOH
9 August 2019	Ontario postpones end of emergency OHIP coverage abroad to accommodate dialysis patients; and Dr. Charles S. Shaver: Enforce Canada Health Act equally for out-of-province medical expenses
14 August 2019	OmbudService for Life & Health Insurance (OLHI) Appoints New CEO
14 August 2019	Health Insurance For Travellers: Ontario Government Backpedals
20 August 2019	Member Bulletin (English et en Français) On AMF Regulatory Issue Updates As At August 15/19
26 August 2019	Canadian Woman Faces Bankruptcy Due To US Hospitalization Fees
28 August 2019	Humania Assurance Inc. Releases "Strategies To Sell Mortgage Insurance Better Than The Banks: A 101 Guide For Today's Insurance Advisors"
6 September 2019	McCarthy Tétrault Hires Lucie Tedesco, Former FCAC Commissioner
11 September 2019	AMF E-Bulletin On Regulation Respecting Alternative Distribution Methods (RADM); and Notice Regarding Information Collection and Insurance Advice
11 September 2019	Blair Morrison Appointed New CEO of FICOM/BCFSA
3 October 2019	FSRA CEO Mark White Expounds/Elaborates On What "Principles-Based Regulation" Means For Financial Services Regulatory Authority of Ontario
4 October 2019	Marjolaine Cantin Appointed Senior Deputy Ombudsman at OLHI
4 October 2019	Commonwealth Bank of Australia Insurance Arm Faces 87 Criminal Charges
11 October 2019	Alberta Superintendent of Insurance Announces Industry/Consumer-Favourable Regulatory Amendments, Including To Fair Practices Regulation By Removing Restrictions Against Electronic Insurance Transactions
15 October 2019	Ontario's New Financial Regulator Wants To Encourage Innovation By Allowing New Product Or Distribution Ideas On A Trial Basis

CAFII Consultations/Submissions Timetable 2019-20

Regulatory Issue	Deliverable	Deadline	Accountable
BC Ministry of Finance 10-Year Review of FIA (Initial Public Consultation Paper released June 2, 2015)	<ul style="list-style-type: none"> Preliminary Recommendations Paper on policy proposals for change CAFII Response to Preliminary Recommendations Paper Ministry announces FICOM transition into Financial Services Authority (FSA) FICOM-led Consultation on Industry Funding of BCFSa (successor regulator) CAFII submission on Industry Funding of BCFSa Proposed Revised Financial Institutions Act released for consultation CAFII submission on proposed revised FIA <i>Meeting with Ministry of Finance staff executives</i> 	<ul style="list-style-type: none"> Released March 19/18 June 19/18 April 4/19 Released June 10, 2019 July 24/19 Q4 2019 (expected) Q4 2019 or Q1 2020 <i>October 25/19</i> 	<ul style="list-style-type: none"> Joint Market Conduct/Licensing Committee; Co-EDs to monitor
AMF Sound Commercial Practices Guideline Update	<ul style="list-style-type: none"> 2018 "update" consultation announced by L. Gauthier AMF releases consultation document CAFII submission on updated Sound Commercial Practices Guideline 	<ul style="list-style-type: none"> May 3/18 Q4 2019 (expected) Q4 2019 or Q1 2020 	<ul style="list-style-type: none"> Market Conduct Cttee; Co-EDs to monitor
Quebec Bill 141 and Related Regulations	<ul style="list-style-type: none"> CAFII submission on Bills 141 and 150 to National Assembly Committee National Assembly passes Bill 141 (certain Bill 150 provisions included) AMF releases Regulation Respecting Alternative Distribution Methods (RADM) CAFII submission on Regulations Supporting Bill 141 AMF Response to Feedback on RADM Implementation/In-Force Period for RADM (varies by Article/Chapter) 	<ul style="list-style-type: none"> January 16, 2018 June 2018 October 10, 2018 December 10, 2018 April 17/19 June 13/19: Chapter 2; June 13/20: Chapter 3 	<ul style="list-style-type: none"> Joint Mkt Conduct/Licensing Committee; Co-EDs to monitor
CCIR/CISRO Guidance: Conduct of Insurance Business and Fair Treatment of Customers	<ul style="list-style-type: none"> CCIR issues final version of FTC Guidance document Meeting with CCIR/CISRO Working Group re Guidance implementation Meeting with CCIR/CISRO Working Group re Guidance implementation <i>Meeting with CCIR/CISRO Working Group re Guidance implementation</i> 	<ul style="list-style-type: none"> September 27, 2018 November 28, 2018 March 27, 2019 <u><i>Deferred from Q4 2019 to Q1 2020</i></u> 	<ul style="list-style-type: none"> Market Conduct Cttee; Co-EDs to monitor
CCIR 2020-2023 Strategic Plan	<ul style="list-style-type: none"> <u>CCIR releases preliminary consultation draft of 2020-23 Strategic Plan</u> <u>CAFII 2019 Stakeholder Meeting With CCIR Focused On Strategic Plan</u> <u>CCIR announces formal deadline for written submissions</u> CAFII submission on CCIR 2020-2023 Strategic Plan 	<ul style="list-style-type: none"> <u>September 30, 2019</u> <u>November 5, 2019</u> <u>Nov 15, 2019 (expected)</u> December 15, 2019 	<ul style="list-style-type: none"> Market Conduct Committee; EOC; Co-EDs to monitor
SK Bill 177	<ul style="list-style-type: none"> CAFII submission on The Insurance Amendment Regulations, 2018 FCAA delays implementation of new Act and Regulations to Jan 1/20 FCAA releases transition-related Guidance and Interpretation Bulletin 	<ul style="list-style-type: none"> September 14, 2018 November 26, 2018 May 17, 2019 	<ul style="list-style-type: none"> Market Conduct Cttee; Co-EDs to monitor
FCNB Insurance Act Rewrite and Introduction of RIA Regime	<ul style="list-style-type: none"> CAFII Meeting with David Weir and Jennifer Sutherland Green, FCNB in Fredericton CAFII submission on FCNB Licensing of Insurance Adjusters and Damage Appraisers Consultation FCNB launches industry consultation on RIA licensing regime model CAFII submissions on FCNB's Insurance Act Rewrite and RIA Regime 	<ul style="list-style-type: none"> June 11, 2019 July 2/19 Q4 2019 (expected) Q4 2019 or Q1 2020 	<ul style="list-style-type: none"> Licensing Committee; Co-EDs to monitor

Underline = new/updated item since previous publication; **Boldface = CAFII response pending**; *Italics = CAFII meeting with regulators/policy-makers pending*

Agenda Item 2(d)
October 29/19 EOC Meeting

Committee Reports Addressing CAFII Priorities

Licensing Efficiency Issues Committee

Since the CAFII Board last met in June, the Licensing Committee has overseen the preparation and delivery of the following CAFII submissions:

- Financial and Consumer Services Commission of New Brunswick (FCNB)'s *Consultation Paper 2019: Licensing of Insurance Adjusters and Damage Appraisers in New Brunswick*, a select number of points raised in which were germane to CAFII members; and
- the Insurance Council of BC's *Consultation on Updated Guidance for New Life Agent Supervision Requirement*.

We also continue to liaise closely and exchange information with David Weir, lead on the FCNB's project to rewrite his province's Insurance Act and, as part of that modernization initiative, introduce a Restricted Insurance Agent (RIA) licensing regime which would be the first in Atlantic Canada.

CAFII has communicated to Mr. Weir, and will continue to reinforce our view, that the FCNB's preliminary intention to change the nomenclature/terminology around its planned RIA regime by calling it an "Incidental Sellers of Insurance Licensing Regime" would be an ill-advised move for a number of reasons, including the fact that it would give rise to some unintended consequences such as precluding the licensure of travel insurance under the regime, as that product is not sold incidentally.

Market Conduct Committee

Since the Board's previous meeting, the Market Conduct Committee has overseen the preparation and delivery of the following CAFII submissions:

- an *Insurance Fees Consultation Paper* related to the industry's "self-funding" of the new BC Financial Services Authority (BCFSA) -- which will replace FICOM, effective November 1/19, and be an independent Crown Corporation;
- a congratulatory and CAFII (re-)introduction letter to Judith Robertson on her appointment as the Financial Consumer Agency of Canada (FCAC)'s new Commissioner; and
- a September letter to the AMF on its decision to require affected insurers to terminate existing/in-force credit protection insurance coverage for non-debtor spouses, where the creditor's pecuniary interest in the life and/or health of the non-debtor spouse cannot be demonstrated to the AMF's satisfaction. Our submission has resulted in a two-month deadline extension, to November 30/19, for affected insurers to submit Action Plans related to this AMF directive.

Other anticipated market conduct regulatory issues for which we are maintaining a watching brief include

- the BC Ministry of Finance's Final Policy Recommendations Paper, arising from its 10-Year Review of the province's Financial Institutions Act, which is expected to be released this Fall;
- Alberta's plans to create a single, integrated financial services regulator;
- an updated Sound Commercial Practices Guideline from the AMF; and
- Phase 2 of the FCAC's Domestic Bank Retail Sales Practices Review.

Media Advocacy Committee

We have been rolling out, or are about to publish, much enhanced content on CAFII's consumer-facing website.

Vignettes, consisting of short, personalized stories about individuals or families purchasing our members' creditor protection insurance and travel insurance products have been published on the website (see example below).

Three new videos, one on mortgage life credit protection insurance, and two on the Pollara Consumer Research on credit protection insurance, have been completed and will be posted on the website within the next few weeks.

The Pollara research was press-released and resulted in four positive trade press stories. As well, CAFII released a press statement on the Ontario government's intention to eliminate OHIP out-of-country coverage, which received much media pickup including CAFII being quoted in the editorials of several newspapers including the Toronto Star. CAFII also participated in an interview with ZOOMER Radio (Libby Znaimer) on OHIP's elimination of out-of-country coverage. Both the live interview, and an English and French transcript of the interview, are now posted on the News section of the CAFII website.

Our search engine optimization firm RankHigher continues to do background work to improve our search results; and in the next month or so, CAFII Board and EOC members will be invited to a meeting at which RankHigher will report on the significant improvements that have continued to occur on our credit protection insurance web search results.

The Media Advocacy Committee will recommend to the Board continued investments in the CAFII website, including the production of additional videos; and, in that respect, will be submitting a request for a \$40K budget allocation for 2020 website enhancements, along with a recommendation to continue with the existing retainer with our media consultant David Moorcroft.

EXAMPLE OF CAFII WEBSITE VIGNETTE



Anne-Sophie and Mathieu, who have two children, have been approved for a \$250,000 mortgage to purchase a home. Anne-Sophie is the primary income earner, and the family's ability to make their mortgage payments is largely dependent on her income.

Peace of mind and predictability of expenses are important for Anne-Sophie and Mathieu, so they purchase Mortgage Life Insurance for Anne-Sophie, which will pay out the balance of their mortgage (up to the maximum specified in the certificate of insurance) in the event of her death. They like the fact that their premiums will not change over the life of their mortgage, which means that they are not exposed to higher costs for this coverage as Anne-Sophie ages or possibly develops health issues.

They also like the fact that the proceeds of her mortgage life insurance will go directly to pay out the mortgage balance rather than possibly being used to pay other debts. It's important to Anne-Sophie that her family will be able to continue living in their family home, without financial duress.

[See FAQ section for more information](#)

Research & Education Committee

The focus for the Research & Education Committee for most of 2019 has been to work on the release of the Pollara Consumer Survey on Mortgage and HELOC Credit Protection Insurance. The report has now been publicly released, and has received positive trade press pickup. Two videos highlighting the research are also close to being finalized and posted on the CAFII website.

Presentations were made on the research results to CCIR/CISRO (webinar), FSRA (in-person), and to the AMF (webinar, in French). We have also presented the results to the CLHIA.

The feedback on those presentations of the research results has been positive and the Research & Education Committee believes that research, such as this most recent Pollara work, contributes to the enhanced public profile of CAFII and helps convey a positive view of credit protection insurance and its many consumer benefits.

The Pollara Consumer Survey was released publicly in June 2019, and so it would have been difficult to engage in another major research initiative in 2019. As well, financial pressures created by AMEX Bank of Canada's departure as a CAFII member put some pressure on CAFII's 2019 operations and financial management. As a result, the \$60K allocated for 2019 research was not spent.

However, the Research & Education Committee will be requesting a \$50K budget allocation in 2020 to fund another research project. The committee will be reconvening this Fall to discuss options around 2020 research, with the objective of providing our recommendation to the Board for approval at its December 3/19 meeting.

Travel Medical Experts Working Group

Over the past several months, the Travel Medical Experts Working Group has been involved in the following issues on behalf of CAFII members.

AMF's Distribution Guide/Summary Document Requirement for Credit Card-Embedded Insurance Coverages

In a recent phone conversation with a CLHIA/ACCAP senior staff member, an AMF staff executive asserted, without being questioned or prompted on this issue, that the regulator will require that a Summary document be provided to consumers who are receiving travel insurance coverage embedded in a credit card.

This ruling by the AMF will significantly impact the industry's ability to distribute credit cards in Quebec.

CAFII will shortly consider the Travel Medical Experts Working Group Chair's recommendation that our Association initiate a possible joint/collaborative approach (CAFII, CLHIA and THIA) to the AMF on this issue, to review and reconsider its decision and/or to provide a deadline extension to implement the Summary document by at least an additional year.

Joint CLHIA/CAFII/THIA Meeting With Ontario Ministry Of Health On The Province's Implementation Of Its Elimination Of Out-of-Country Travel Health Claims

A joint CLHIA/CAFII/THIA meeting with Ontario Ministry of Health (MOH) officials was hosted by CLHIA on September 19/19. The MOH was represented at the meeting by Randy Riddell, Senior Manager Claims Reimbursement; Julie Ingo, Senior Manager; and Leanne Palilionis, Senior Program Consultant.

The following were the key items communicated by the MOH and discussed in the meeting:

- **Implementation** on January 1, 2020 – End of OHIP coverage for out-of-country travel health claims;
- **Claims Payment:** MOH will be responsible for any claims up to December 31/19 @ 11:59 pm (time zones may be a complication; however MOH is willing to work out arrangements directly with insurers);
- **Exception:** renal dialysis patients will continue to receive funding for hospital and physician claims through a special program set up with the Ontario Renal Network in Cancer Care Ontario; this is not a continuance of the OHIP out-of-country program but rather a new program; all Ontario OHIP out-of-country coverage ends December 31/19.
- **Communications Plan:** a communications plan has been developed that uses web postings, social media, starting around Canadian Thanksgiving and will surge at other prominent travel holidays such as US Thanksgiving, Black Friday, and Christmas. MOH will encourage CLHIA and the other industry Associations to add links to or retweet. The OHIP message to buy travel insurance will likely carry on, as OHIP recommends travel insurance even for inter-provincial travel.

- **Question from MOH:** what premium increases will be seen as a result of these OHIP changes?
Action Item: CLHIA will draft an answer and circulate it to the Committee for comment, before forwarding it as a response to the MOH's question.
- **Comment from MOH:** concern from patients that contracts/booklets indicate OHIP is the first payer. This is a concern related mainly to the group travel insurance side as contracts/booklets are not frequently updated. MOH would like some wording regarding this that they can share in communications. Action Item: CLHIA will draft an answer and circulate to the Committee for comment, before forwarding it as a response to the MOH's comment.

Regulator and Policy-Maker Visit Plan 2019-2020

Regulator/Policy-Maker	Last Meeting/Contact	Proposed Meeting	Topics/Purpose	Status
British Columbia				
Insurance Council of BC: Janet Sinclair, Executive Director (Started November 1/17)	May 10/19 liaison meeting during CLHIA Conference in Niagara Falls	Meeting with Insurance Council of BC staff executives on October 25/19 during CAFII Western Canada Insurance Regulators and Policy-Makers Visits Tour	CAFII's views on optimal features of an RIA regime in BC	Confirmed
BC Financial Services Authority (BCFSA): Blair Morrison, Superintendent of Financial Institutions (effective July 2019)		Meeting with BC FICOM/new Financial Services Authority (FSA) staff executives on October 25/19 during CAFII Western Canada Insurance Regulators and Policy-Makers Visits Tour	future of FICOM if proposals made in Ministry of Finance's "Preliminary Recommendations Paper" are brought to fruition	Confirmed
Ministry of Finance: Kari Toovey, Acting Executive Director, Strategic Projects & Policy (head of 10-Year Review of FIA);	April 20/17 and June 23/16 telephone conversations with B. Wycks re updates on expected release date of Policy Paper and other FIA Review timelines November 10/15 in Vancouver along with Dan Ashton; and separate meeting along with Brian Dillon and Kari Toovey	Meeting with BC Ministry of Finance officials on October 25/19 during CAFII Western Canada Insurance Regulators and Policy-Makers Visits Tour Q4 2019 in-person or teleconference meeting with Ministry of Finance officials, if necessary.	Insurance policy changes to be set out in draft revised Financial Institutions Act, expected in Q2 2019.	Confirmed Pending
Alberta				
Alberta Insurance Council: Joanne Abram, CEO	May 10/19 liaison meeting during CLHIA Conference in Niagara Falls	Meeting with Alberta Insurance Council staff executives on October 24/19 CAFII during Western Canada Insurance Regulators and Policy-Makers Visits Tour	-Alberta Government consultation paper on plans to create a single financial services regulator in the province	Confirmed

Regulator and Policy-Maker Visit Plan 2019-2020

Regulator/Policy-Maker	Last Meeting/Contact	Proposed Meeting	Topics/Purpose	Status
	October 18/17 liaison meeting in Edmonton as part of CAFII tour of BC/Alberta/Manitoba regulators and policy-makers	Q4 2019 teleconference meeting to discuss Alberta Government consultation paper on plans to create a single financial services regulator in the province, once it is released	AIC's implementation of approved definition and process for CI to be sold under existing RIA licence	Pending
Treasury Board and Ministry of Finance: Darren Hedley, Assistant Deputy Minister, Financial Sector Regulation and Policy; and Superintendent of Insurance (effective January 2019, succeeding Nilam Jetha)	-liaison meeting on October 18/17 in Edmonton as part of CAFII tour of BC/Alberta/Manitoba regulators and policy-makers	Meeting with Alberta Treasury Board and Finance officials on October 24/19 CAFII during Western Canada Insurance Regulators and Policy-Makers Visits Tour Q4 2019 teleconference meeting to discuss Alberta Government consultation paper on plans to create a single financial services regulator in the province, once it is released	Alberta Government plans to create a single financial services regulator in the province	Confirmed Pending
Saskatchewan				
Insurance Councils of Saskatchewan: Ron Fullan, Executive Director, (CISRO Chair)	May 9/19 liaison meeting during CLHIA Conference in Niagara Falls	Meeting with Insurance Councils of Saskatchewan staff executives on October 23/19 during CAFII Western Canada Insurance Regulators and Policy-Makers Visits Tour		Confirmed
Janette Seibel, Lawyer, became lead on Bill 177 and Regulations file effective June 1/15	May 13/19 teleconference meeting with B. Wycks and K. Martin re Saskatchewan Insurance Act and Regulations implementation issues	Meeting with FCAA officials on October 23/19 during CAFII Western Canada Insurance Regulators and Policy-Makers Visits Tour	-timing of "in force" date for new Saskatchewan Insurance Act and related Regulations	Confirmed

Regulator and Policy-Maker Visit Plan 2019-2020

Regulator/Policy-Maker	Last Meeting/Contact	Proposed Meeting	Topics/Purpose	Status
<p>Donna Harpauer, Minister of Finance (appointed Oct/17)</p> <p>Glen Gardner, QC, Deputy Minister of Justice and Deputy Attorney General</p>		<p>None at this time</p> <p>Meeting with Ministry of Justice Officials, to which FCAA is accountable on October 23/19 during Western Canada Insurance Regulators and Policy-Makers Visit Tour</p>	<p>How Saskatchewan can foster innovation and reduce red tape in the life and health insurance sector, including in credit protection insurance</p>	Confirmed
Manitoba				
Ministry of Finance: Scott Moore, Deputy Superintendent of Insurance	-CAFI Stakeholder Meeting with CCIR on October 25/18 in Toronto	Meeting with Superintendent of Insurance and/or other Financial Institutions Regulation Branch officials on October 22/19 during CAFI Western Canada Insurance Regulators and Policy-Makers Visits Tour	-Maintain and build relationship	Confirmed
Barbara Palace Churchill, Executive Director, Insurance Council of Manitoba (appointed late November 2016)	<p>May 10/19 liaison meeting during CLHIA Conference in Niagara Falls</p> <p>-May 3/18 liaison meeting during CLHIA Conference in Calgary</p>	Meeting with Insurance Council of Manitoba officials on October 22/19 during CAFI Western Canada Insurance Regulators and Policy-Makers Visits Tour	-CAFI response letter of March 2018 re Single Premium Insurance Policies	Confirmed
Ontario				
Financial Services Regulatory Authority of Ontario (FSRA): Mark White, CEO	<p>24-Jun-19</p> <p>February 8, 2019 IAG Meeting #3 with FSRA Board of Directors re FSRA's 2019-20 priorities and budget</p> <p>January 28, 2019 IAG – Life and Health Insurance meeting with FSRA Management re FSRA's 2019-20 priorities and budget</p>	None at this time	<p>"Let's Celebrate FSRA" Inaugural launch with FSRA Executive Team, and comments by Ontario Minister of Finance</p> <p>-FSRA's start-up; transition from FSCO into FSRA; FSRA's rule-making authority; FSRA's plans for regulating the life and health insurance industry</p>	Completed

Regulator and Policy-Maker Visit Plan 2019-2020

Regulator/Policy-Maker	Last Meeting/Contact	Proposed Meeting	Topics/Purpose	Status
	<p>November 26/18 meeting of IAG—Life and Health Insurance with FSRA CEO re FSRA's 2019-2020 policies and priorities</p> <p>November 27/18 CAFII Reception (where Mark White was guest speaker on a FSRA policy-related topic)</p>			Confirmed
FSRA: Executive Team Including Houston Loke Executive Vice President Market Conduct	July 29 2019		Presentation by Lesli Martin and CAFII of Pollara Consumer Survey on Credit Protection Insurance	Completed
Glen Padassery, Executive Vice President of Policy	May 17/19 get acquainted and liaison lunch with CAFII delegation -February 8/19 and January 28/19 IAG - Life and Health Insurance meetings with FSRA	See M. White above		Pending
Judy Pfeifer, Chief Public Affairs Officer	May 8/19 informal conversation with K. Martin and B. Wycks at CLHIA Conference in Niagara Falls	See M. White above		Pending
FSRA: Swati Agarwal, Manager, FSRA	18 September, 2019: Telephone conversation about CAFII joining Sectoral Advisory Group, and consultation on CAFII's current priorities		CAFII Priorities	Completed
Quebec				
AMF: Louis Morisset, CEO;	-AMF Rendez-Vous on November 19/18 in Montreal	AMF Rendez-Vous Conference on November 25/19		Pending

Regulator and Policy-Maker Visit Plan 2019-2020

Regulator/Policy-Maker	Last Meeting/Contact	Proposed Meeting	Topics/Purpose	Status
		Rescheduled CAFII Liaison Lunch and Industry Issues Dialogue with AMF staff executives on April 7/20; in Levis/Quebec City in early 2020	-(i) Bill 141 and Bill 150 to modernize Quebec's financial services sector, including the Distribution Act (both released by Ministry of Finance in October 2017)	Pending
Frédéric Pérodeau (became new Superintendent, Client Services and Distribution Oversight on January 22/18, succeeding Eric Stevenson; joined AMF in 2012)	24-Sep-19 -AMF Rendez-Vous on November 19/18 in Montreal -CAFII/AMF Liaison Lunch and Industry Issues Dialogue on October 2/18	See Louis Morisset above -None at this time	Telephone conversation Keith Martin and Frederic Perodeau on the AMF decision to cancel the 1 October, 2019 CAFII Board Meeting -See L. Morisset above	Complete
Nathalie Sirois, Senior Director, Supervision of Insurers and Control of Right to Practise	23 September, 2019: Keith Martin discusses AMF Spousal Issue with Nathalie Sirois on the phone		AMF Spousal Coverage issue	Completed
New Brunswick				
Financial and Consumer Services Commission (Insurance Division): Angela Mazerolle, Superintendent of Insurance	May 8/19 liaison meeting during CLHIA Conference in Niagara Falls May 14/18 liaison meeting in Fredericton, as part of CAFII Atlantic Canada insurance regulators and policy-makers visits tour	See D. Weir below	FCNB Multi-year Insurance Act Rewrite project under which FCNB plans to introduce an RIA regime in New Brunswick	Completed

Regulator and Policy-Maker Visit Plan 2019-2020

Regulator/Policy-Maker	Last Meeting/Contact	Proposed Meeting	Topics/Purpose	Status
David Weir, Deputy Superintendent of Insurance	December 5/18 preliminary meeting in Toronto on New Brunswick Insurance Act Rewrite multi-year project	June 11/19 FCNB "Consumer Protection Conference", around which a CAFII liaison meeting in Fredericton could be arranged to discuss FCNB's plans to introduce an RIA regime in the province.	See A. Mazerolle above - timing of final recommendations on reforming licensing framework for other-than-life agents and brokers -CAFII feedback on New Brunswick online insurance licensing system	Completed
Opportunities New Brunswick: Cameron Bodnar, Director, Strategy & Planning	-May 15/18 liaison meeting in Fredericton, NB	None at this time	-Insurance Act and regulatory process changes necessary to support business efficiency and further inbound investment and additional jobs in New Brunswick	
Nova Scotia				
Superintendent of Insurance: Paula Boyd, Superintendent of Insurance	May 14/18 liaison meeting in Halifax, NS as part of CAFII Atlantic Canada insurance regulators and policy-makers visits tour	CAFII Stakeholder Meeting With CCIR; November 5/19	-refreshed "Seven Point Guide to The Creditor Insurance Regulatory Regime," to be presented by CAFII as an educational resource to counteract false impression that ISI is unregulated	Confirmed
PEI				
Superintendent of Insurance: Robert Bradley, Superintendent	-CAFII Stakeholder Meeting with CCIR on October 25/18 in Toronto	CAFII Stakeholder Meeting With CCIR; November 5/19	-refreshed "Seven Point Guide to The Creditor Insurance Regulatory Regime," to be presented by CAFII as an educational resource to counteract false impression that ISI is unregulated	Confirmed
Newfoundland				
Superintendent of Insurance: Renee Dyer, Superintendent of Insurance (appointed July 2018) Craig Whalen, Acting Superintendent of Superintendent of Insurance	May 17/18 liaison meeting in St. John's, NF (Craig Whalen) during CAFII Atlantic Canada insurance regulators and policy-makers visits tour	CAFII Stakeholder Meeting With CCIR; November 5/19	-refreshed "Seven Point Guide to The Creditor Insurance Regulatory Regime," to be presented by CAFII as an educational resource to counteract false impression that ISI is unregulated	Confirmed

Regulator and Policy-Maker Visit Plan 2019-2020

Regulator/Policy-Maker	Last Meeting/Contact	Proposed Meeting	Topics/Purpose	Status
FEDERAL/NATIONAL				
Patrick Dery, Chair CCIR Tony Toy, Policy Manager CCIR	November 28/18 CAFII follow-up meeting with CCIR/CISRO Fair Treatment of Consumers Working Group re industry implementation of "Guidance: Conduct of Insurance Business and Fair Treatment of Customers" -November 1/18 CCIR issues update meeting with CAFII (K. Martin and B. Wycks)	CAFII Annual Stakeholder Meeting with CCIR; November 5/19 CAFII Quarterly "Fair Treatment of Consumers Guidance Implementation Forum" with CCIR and CISRO, March 27, 2019 3:30-5:00pm CCIR Webinar For the Life and Health Insurance Industry on Year 3 Changes to the Annual Statement on Market Conduct: April 3/19	-CCIR Annual Statement on Market Conduct -Framework for Cooperative Market Conduct Supervision	Confirmed
Louise Gauthier, Chair of CCIR/CISRO Fair Treatment of Consumers Working Group; (member of CCIR Travel Insurance Working Group)	CAFII "Fair Treatment Of Customers Guidance Implementation Forum" with CCIR And CISRO on March 27/19	CAFII quarterly "Fair Treatment of Customers Guidance Implementation Forum" with CCIR/CISRO FTC Working Group; fall 2019 meeting deferred to spring 2020		Confirmed
CISRO: Ron Fullan, Chair (SK)	-November 28/18 CAFII follow-up meeting with CCIR/CISRO Fair Treatment of Consumers Working Group re industry implementation of "Guidance: Conduct of Insurance Business and Fair Treatment of Customers"	CAFII quarterly "Fair Treatment of Customers Guidance Implementation Forum" with CCIR/CISRO FTC Working Group; fall 2019 meeting deferred to spring 2020	-national, online licensing system for insurance and related harmonization issues	Confirmed

Regulator and Policy-Maker Visit Plan 2019-2020

Regulator/Policy-Maker	Last Meeting/Contact	Proposed Meeting	Topics/Purpose	Status
Financial Consumer Agency of Canada (FCAC): Judith Robertson, Commissioner (departing FCAC's employ effective August 18/19)	-June 12/18 informal conversation with B. Wycks and K. Martin following L. Tedesco's luncheon address to Economic Club of Canada	October 28/19 meeting at FCAC office in Ottawa for information-sharing and education around creditors protection insurance	-FCAC consultation on its Proposed Supervision Framework and Publishing Principles for FCAC Decisions (released September 29/16 with November 14/16 deadline for submissions) of document expected). CAFII decided not to respond to this consultation, as out-of-scope	Confirmed

Agenda item 2 (f)
October 29 EOC Meeting

Program For AMF 2019 Rendez-Vous Mini-Conference: Monday, November 25/19

OVERVIEW OF THE DAY

9:30 am - Welcome of participants
10:30 am - Opening remarks by Louis Morisset, CEO of the Autorité des marchés financiers
11:00 am - Lecture by J. Mark Weber, Eyton Director of the Conrad School of Entrepreneurship & Business at the University of Waterloo. ** This conference will be offered in English. Headphones for simultaneous French translation will be available for free*
12:30 pm - Lunch
1:30 pm - Remarks by Eric Girard, Quebec Minister of Finance
2:15 pm - Workshop 1 or 2
3:15 pm - Coffee break
3:30 pm - Workshop 3 or 4
4:30 pm - Networking

11:00 - Conference

J. Mark Weber, Eyton Director Conrad School of Entrepreneurship & Business, University of Waterloo
"Trust: build it, feed it and try to restore it"

Trust is the foundation of our personal and professional relationships. However, we rarely push the reflection on the dynamics of this feeling. Why do people trust us? Why the opposite? How is confidence built? How to restore it if it is shaken or lost? Professor Weber will invite us to take a look at our experiences and our organizational practices through the critical lens of the psychology of trust.

** This conference will be offered in English. Headphones for simultaneous French translation will be available for free*

12:30 pm - Lunch

1:30 pm – Speech by Eric Girard, Quebec Minister of Finance

2:15 pm - Workshop 1 or 2 (at the participant's discretion)

WORKSHOP 1 / Open data: is our financial system ready?

Open data (*open data*) could allow consumers and businesses to have access to new financial products and services on technology platforms. This business model implies that third-party service providers access confidential data from customers of traditional financial institutions (banks, insurers, etc.). Is our financial system ready for this type of model? What are the risks? How to prepare?

Moderator : Hélène Samson, Director of the Prudential Framework for Financial Institutions, Autorité des marchés financiers

Panellists :

- Patrick Mignault, Professor at the Faculty of Law of the Université de Sherbrooke and member of the Advisory Committee for Consumer Products and Financial Services Users of the Autorité des marchés financiers
- François Lafortune, President of Diagram, member of the AMF's Advisory Committee on Technological Innovation and member of the Open Banking Advisory Committee, established by the Department of Finance Canada
- Other upcoming panelists

WORKSHOP 2 / Natural disasters in Quebec: increasing risks to manage

The latest natural disasters in Quebec have had serious consequences for the affected population. Their impact has also been felt on the financial sector. Are we better prepared today than yesterday to mitigate the economic consequences of future floods or earthquakes? How can we improve our collective resilience?

Moderator : Nathalie Sirois, Senior Director, Insurance Supervision and Supervision, Financial Markets Authority

Panel : Coming soon

3:15 pm - Coffee break

3:30 pm - Workshop 3 or 4 (at the participant's choice)

WORKSHOP 3 / Responsible Artificial Intelligence

Technological advances have paved the way for the use of Artificial Intelligence (AI) algorithms in the finance industry. These algorithms generate significant productivity gains, but also raise a number of ethical issues. Panelists will discuss ethical principles that can guide the use of AI in finance.

Moderator : Oumar Diallo, Fintech and Innovation Director, Autorité des marchés financiers

Panellists :

- Charles Morgan, Partner McCarthy Tétrault and CCTI member

- Nathalie de Marcellis-Warin, President and CEO of CIRANO and Professor at Polytechnique Montréal
- Lionel Pimpin, Senior Vice President, Digital Channels and Individual and Corporate Strategies, National Bank

WORKSHOP 4 / Consumer satisfaction: everyone's business

Consumers of financial products and services use multiple channels to communicate and expect an ever faster and more personalized response. In this hyper-connected environment, how can the industry better support and assist consumers? What types of mechanisms can be put in place to improve customer service? How to improve the handling of complaints? The idea of joint responsibility will be explored in the discussions, as all industry players share a common interest: consumer satisfaction.

Moderator : Frédéric Pérodeau, Superintendent Customer Support Distribution Coaching, Autorité des marchés financiers

Panellists :

- Mark Weber, Keynote Speaker and University Professor at the University of Waterloo
- Brigitte Boutin, President of the Advisory Committee for Consumer Products and Financial Services Users of the Autorité des marchés financiers
- Geneviève Trottier, Client Ombudsman, National Bank
- Antoine Bédard, Senior Director of Management and Distribution Operations, Autorité des marchés financiers

CAFII

411 Richmond Street E, Suite 200
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Statement of Operations As at Sept 30, 2019

	Current Month	Budget Sep-19	Variance to Monthly Budget	Current YTD	Budget '19 YTD	Variance Budget to YTD	Budget 2019
Revenue							
Membership Dues	\$61,422	\$61,422	\$0	\$550,798	\$552,798	(\$2,000)	\$737,064
Luncheon Revenue	\$0	\$0	\$0	\$195	\$195	\$0	\$195
Interest Revenue	\$129	\$3	\$126	\$613	\$24	\$589	\$33
TOTAL REVENUE	\$61,551	\$61,425	\$126	\$551,606	\$553,017	(\$1,411)	\$737,292
Expenses							
Management Fees	\$38,084	\$40,167	\$2,083	\$350,881	\$361,500	\$10,619	\$482,000
CAFII Legal Fees/Corporate Governan	\$0	\$0	\$0	\$0	\$1,000	\$1,000	\$1,000
Audit Fees	\$1,217	\$1,217	\$0	\$11,152	\$10,953	(\$199)	\$14,600
Insurance	\$449	\$458	\$9	\$3,992	\$4,122	\$130	\$5,500
Website Ongoing Maintenance	\$578	\$283	(\$295)	\$4,639	\$4,379	(\$260)	\$5,330
Telephone/Fax/Internet	\$520	\$483	(\$37)	\$4,905	\$4,347	(\$558)	\$5,800
Postage/Courier	\$0	\$33	\$33	\$140	\$297	\$157	\$400
Office Expenses	\$140	\$166	\$26	\$1,619	\$1,494	(\$125)	\$2,000
Bank Charges	\$0	\$4	\$4	\$62	\$36	(\$26)	\$50
Miscellaneous Expenses	\$0	\$42	\$42	\$0	\$378	\$378	\$500
Depreciation Computer/Office Equipm	\$95	\$100	\$5	\$852	\$900	\$48	\$1,200
Board/EOC/AGM							
Annual Members Lunch	\$0	\$0	\$0	\$12,052	\$12,089	\$37	\$12,089
Board Hosting (External)	\$0	\$0	\$0	\$6,363	\$15,000	\$8,637	\$30,000
Board/EOC/Meeting Expenses	\$1,268	\$2,600	\$1,332	\$31,296	\$18,200	(\$13,096)	\$26,000
Industry Events	\$0	\$0	\$0	\$0	\$1,300	\$1,300	\$1,300
EOC Annual Appreciation Dinner	\$0	\$0	\$0	\$2,193	\$2,193	\$0	\$2,193
Sub Total Board/EOC/AGM	1,268	2,600	1,332	51,904	48,782	- 3,122	71,582
Provincial Regulatory Visits	\$0	\$0	\$0	\$4,836	\$8,000	\$3,164	\$12,000
Research/Studies	\$130	\$0	(\$130)	\$3,790	\$3,000	(\$790)	\$5,000
Website SEO and Enhancements	\$3,947	\$3,333	(\$613)	\$15,093	\$30,000	\$14,907	\$40,000
Regulatory Model(s)	\$3,912	\$0	(\$3,912)	\$7,555	\$15,000	\$7,445	\$25,000
Federal Financial Reform	\$0	\$500	\$500	\$0	\$500	\$500	\$500
Media Outreach	\$2,260	\$2,917	\$657	\$26,023	\$26,250	\$227	\$35,000
Marketing Collateral	\$0	\$0	\$0	\$542	\$4,000	\$3,458	\$5,000
Speaker fees & travel	\$0	\$0	\$0	\$1,189	\$1,400	\$211	\$2,000
Gifts	\$0	\$0	\$0	\$100	\$300	\$200	\$500
Networking Events	\$0	\$0	\$0	\$0	\$300	\$300	\$500
Sub Total Networking & Events	-	-	-	1,289	2,000	711	3,000
TOTAL EXPENSE	52,598	52,303	- 296	489,274	526,938	37,665	715,462
NET INCOME	8,952	9,122	- 170	62,332	26,079	36,253	21,830

Explanatory Notes:

- 1 - Amortization of office equipment based on 4 year straight line depreciation
- 2 - Management fees includes Mananging Matters and Executive Director
- 3 - Website includes hosting cafii.com, subscription and website improvements

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Balance Sheet As at Sept 30, 2019

	CAFII Operations			CCBPI Project			Combined												
	30-Sep 2019	31-Aug 2019	31-Dec 2018	30-Sep 2019	31-Aug 2019	31-Dec 2018	30-Sep 2019	31-Aug 2019	31-Dec 2018										
ASSETS																			
Current Assets																			
Bank Balance	\$412,909	\$466,063	\$193,381	\$0	\$0	\$0	\$412,909	\$466,063	\$193,381										
Savings Account	\$613	\$484	\$0	\$205,257	\$205,257	\$0	\$205,870	\$205,741	\$0										
Accounts Receivable	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0										
Prepaid Expenses	14,110	16,465	2,197	\$0	\$0	\$0	\$14,110	\$16,465	\$2,197										
Computer/Office Equipment	\$8,014	\$8,014	\$8,014	\$0	\$0	\$0	\$8,014	\$8,014	\$8,014										
Accumulated Depreciation -Comp/Equip	(\$5,458)	(\$5,363)	(\$4,605)	\$0	\$0	\$0	(\$5,458)	(\$5,363)	(\$4,605)										
Total Current Assets	\$430,187	\$485,663	\$198,986	\$205,257	\$205,257	\$0	\$635,444	\$690,920	\$198,986										
TOTAL ASSETS	\$430,187	\$485,663	\$198,986	\$205,257	\$205,257	\$0	\$635,444	\$690,920	\$198,986										
LIABILITIES																			
Current Liabilities																			
Accrued Liabilities	\$10,953	\$9,736	\$18,409	\$103,317	\$89,632	\$0	\$114,270	\$99,368	\$18,409										
Credit Card	\$290	\$461	\$0	\$0	\$0	\$0	\$290	\$461	\$0										
Account Payable	\$2,548	\$6,600	\$10,379	\$0	\$0	\$0	\$2,548	\$6,600	\$10,379										
Deferred Revenue	\$183,866	\$245,288	\$0	\$101,940	\$115,625	\$0	\$285,806	\$360,913	\$0										
Total Current liabilities	\$197,657	\$262,255	\$28,788	\$205,257	\$205,257	\$0	\$402,914	\$467,342	\$28,788										
TOTAL LIABILITIES	\$197,657	\$262,255	\$28,788	\$205,257	\$205,257	\$0	\$402,914	\$467,342	\$28,788										
UNRESTRICTED NET ASSETS																			
Unrestricted Net Assets, beginning of year	\$170,198	\$170,198	\$180,447	\$0	\$0	\$0	\$170,198	\$170,198	\$180,447										
Excess of revenue over expenses	\$62,332	\$53,379	(\$10,248)	\$0	\$0	\$0	\$62,332	\$53,379	(\$10,248)										
Total Unrestricted Net Assets	\$232,530	\$223,408	\$170,198	\$0	\$0	\$0	\$232,530	\$223,578	\$170,198										
Total Unrestricted Net Assets	\$232,530	\$223,408	\$170,198	\$0	\$0	\$0	\$232,530	\$223,578	\$170,198										
TOTAL LIABILITIES AND UNRESTRICTED	\$430,187	\$485,663	\$198,986	\$205,257	\$205,257	\$0	\$635,444	\$690,920	\$198,986										
<table border="1"> <tr> <td colspan="5"> Financial Reserves Targets as per 2019 Budget: Minimum 3 months (25%) of Annual Operating Expenses= \$ 178,866 Maximum 6 months (50%) of Annual Operating Expenses= \$ 357,731 Current Level of Financial Reserves (total unrestricted net assets): \$232,530 Current Level of Financials Reserve (%): 33% </td><td colspan="5"> CCBPI Initiative Time value of consulting services incurred to date (30 Sept 2019) \$103,316.82 (\$91,419.15 plus HST) </td></tr> </table>										Financial Reserves Targets as per 2019 Budget: Minimum 3 months (25%) of Annual Operating Expenses= \$ 178,866 Maximum 6 months (50%) of Annual Operating Expenses= \$ 357,731 Current Level of Financial Reserves (total unrestricted net assets): \$232,530 Current Level of Financials Reserve (%): 33%					CCBPI Initiative Time value of consulting services incurred to date (30 Sept 2019) \$103,316.82 (\$91,419.15 plus HST)				
Financial Reserves Targets as per 2019 Budget: Minimum 3 months (25%) of Annual Operating Expenses= \$ 178,866 Maximum 6 months (50%) of Annual Operating Expenses= \$ 357,731 Current Level of Financial Reserves (total unrestricted net assets): \$232,530 Current Level of Financials Reserve (%): 33%					CCBPI Initiative Time value of consulting services incurred to date (30 Sept 2019) \$103,316.82 (\$91,419.15 plus HST)														

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Membership Fees As At September 30th, 2019

	<u>Jan-18</u>		<u>Jul-18</u>	
	<u>To be billed</u>	<u>Received</u>	<u>To be billed</u>	<u>Received</u>
BMO Bank of Montreal	\$ 36,719.00	14-Mar-19	\$ 36,719.00	16-Aug-19
CIBC Insurance	\$ 36,719.00	28-Feb-19	\$ 36,719.00	29-Jul-19
RBC Insurance	\$ 36,719.00	25-Feb-19	\$ 36,719.00	30-Jul-19
ScotiaLife Financial	\$ 36,719.00	11-Feb-19	\$ 36,719.00	11-Jul-19
TD Insurance	\$ 36,719.00	11-Feb-19	\$ 36,719.00	31-Jul-19
Desjardins Financial Security Life Assurance Company	\$ 36,719.00	8-Apr-19	\$ 36,719.00	26-Aug-19
AMEX Bank of Canada				
Assurant Solutions	\$ 18,360.00	12-Feb-19	\$ 18,359.00	4-Jul-19
Canadian Premier Life Insurance Company	\$ 18,360.00	23-May-19	\$ 18,359.00	16-Aug-19
Cumis Group Ltd/Co-operators Life Insurance Co.	\$ 18,360.00	14-Mar-19	\$ 18,359.00	9-Jul-19
National Bank Life Insurance Company	\$ 27,540.00	15-Feb-19	\$ 27,539.00	8-Jul-19
Manulife Financial	\$ 22,000.00	29-May-19	\$ 22,000.00	11-Jul-19
The Canada Life Assurance Company	\$ 22,000.00	25-Feb-19	\$ 22,000.00	22-Jul-19
RSM Canada	\$ 4,800.00	15-Feb-19		
Willis Towers Watson	\$ 4,800.00	4-Apr-19		
KPMG MSLP	\$ 4,800.00	27-Feb-19		
Munich Reinsurance Company Canada Branch (Life)	\$ 4,800.00	15-Feb-19		
Optima Communications	\$ 4,800.00	28-Mar-19		
RGA Life Reinsurance Company of Canada	\$ 4,800.00	25-Feb-19		
DGA Careers Inc.				
AXA Assistance Canada				
Torys LLP	\$ 4,800.00	13-Feb-19		
PWC	\$ 4,800.00	15-Jul-19		
RankHigher.ca			\$ 2,400.00	9-Jul-19
Feb Invoices	\$385,334		\$349,330	
July Invoices	\$349,330			
Total Membership Fees	\$734,664			
Total amount to reallocate monthly Jan-Sept	\$ 61,222			
Total amount to reallocate monthly Oct-Dec	\$ 61,222			

2019 CAFII Budget

	2016 Actual	2017 Actuals	2018 Actuals	2019 Budget Revised	2019 Revised Budget (Apr 2019)	2019 YTD (Sept 30)	2019 Revised Forecast	Comment/Rationale
Revenue								
Membership Dues	\$435,750	\$475,425	\$695,545	\$757,904	\$737,064	\$550,798	\$734,664	See breakdown in Member Dues Revenue Tab
Luncheon 2019	\$231	\$126	\$0	\$0	\$195	\$195	\$195	
Interest	\$231	\$126	\$0	\$0	\$33	\$613	\$700	Interest from the Savings Account
TOTAL REVENUE	\$ 436,212	\$ 475,677	\$ 695,545	\$ 757,904	\$ 737,292	\$ 551,606	\$ 735,559	
EXPENSE								
Management Fees	\$279,042	\$442,012	\$460,299.15	\$482,000	\$482,000	\$350,881	\$465,133	Includes MM Fees (3% increase) and two Co-Eds (3% increase)
CAFII Legal Fees/Corporate Governance	\$10,565	\$2,954	\$563	\$1,000	\$1,000	\$0	\$0	
Audit Fees	\$13,560	\$14,271	\$14,432	\$14,600	\$14,600	\$11,152	\$14,803	Same as 2018 Budget
Insurance	\$5,238	\$5,238	\$5,258	\$5,500	\$5,500	\$3,992	\$5,338	Same as 2018 Budget
Website Ongoing Maintenance	\$13,060	\$42,575	\$6,461	\$5,330	\$5,330	\$4,639	\$5,539	Includes CG Technology (\$250 per month), Translation (\$400), Domain (\$30) & CAFII Insurance Domain Name Renewal (\$999 USD)
Telephone/Fax/Internet	\$3,538	\$6,119	\$5,939	\$5,800	\$5,800	\$4,905	\$5,800	Same as 2018 Budget
Postage/Courier	\$180	\$380	\$458	\$400	\$400	\$140	\$200	Same as 2018 Budget
Office Expenses	\$5,257	\$1,312	\$2,423	\$2,000	\$2,000	\$1,619	\$2,000	Same as 2018 Budget
Bank Charges	\$25	\$38	\$23	\$50	\$50	\$62	\$62	Same as 2018 Budget
Amortization Expense	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
Depreciation Computer/Office Equipment	\$467	\$1,564	\$1,136	\$1,200	\$1,200	\$852	\$1,136	Same as 2018 Budget
Miscellaneous Expense		\$433	\$0	\$500	\$500	\$0	\$500	Same as 2018 Budget
Board/EOC/AGM								
Annual Members Luncheon	\$12,044	\$10,247	\$10,503	\$12,000	\$12,089	\$12,052	\$12,052	Increase to \$12,000 to cover costs
Board Hosting (External)	\$19,407	\$7,500	\$19,515	\$30,000	\$30,000	\$6,363	\$22,500	Four events at \$7,500
Board/EOC Meeting Expenses	\$8,145	\$25,493	\$20,715	\$26,000	\$26,000	\$31,296	\$38,796	Same as 2018 Budget
Industry Events		\$36	\$1,270	\$1,300	\$1,300	\$0	\$1,300	CAFII Purchase of full table of 11 seats at Economic Club of Canada Luncheon
EOC Annual Appreciation Dinner	\$2,079	\$8	\$763	\$800	\$2,193	\$2,193	\$2,193	Same as 2018 Budget
Total Board/EOC/AGM	\$41,675	\$43,284	\$52,766	\$70,100	\$71,582	\$51,904	\$76,841	
Provincial Regulatory Visits	\$10,395	\$11,011	\$11,230	\$12,000	\$12,000	\$4,836	\$12,000	Same as 2018 Budget
Research/Studies	\$1,356	\$17,807	\$77,345	\$60,000	\$5,000	\$3,790	\$5,500	Pollara Proposal on Creditor's insurance research
Website SEO and Enhancements			\$21,702	\$40,000	\$40,000	\$15,093	\$39,550	Continuing enhancements including videos
Regulatory Model(s)	\$0	\$15,001	\$6,490	\$25,000	\$25,000	\$7,555	\$25,000	Includes provision for legal advice re RIA representation on Sask, Alta, Manitoba; possible new RIA regime in BC; new single integrated regulators in Ontario and Alta; and additional provision re Regulations supporting Quebec Bills 141 and 150
Federal Financial Reform	\$0	\$0	\$0	\$500	\$500	\$0	\$500	Same as 2018 Budget
Media Outreach	\$27,408	\$44,023	\$38,522	\$35,000	\$35,000	\$26,023	\$35,000	Includes Media Consultant's Monthly Retainer (\$2,260.00 per month)
Marketing Collateral	\$1,781	\$0	\$557	\$5,000	\$5,000	\$542	\$5,000	
Tactical Communications Strategy	\$446	\$379	\$0	\$0	\$0	\$0	\$0	
CAFII Reception Events		\$500	\$0	\$0	\$0	\$0	\$0	
Media Relations	\$0	\$164	\$0	\$0	\$0	\$0	\$0	
Speaker fees & travel		\$0	\$191	\$2,000	\$2,000	\$1,189	\$2,000	Same as 2018 Budget
Gifts	\$221	\$452	\$0	\$500	\$500	\$100	\$500	Same as 2018 Budget
CAFII 25th Anniversary Celebration (Formerly CAFII 20th Anniversary Celebration)		\$26,495	\$0	\$0	\$0	\$0	\$0	Deferred to 2022
Networking Events		\$0	\$0	\$0	\$0	\$0	\$0	
	\$350	\$500	\$500	\$500	\$500	\$0	\$500	Same as 2018 Budget
TOTAL EXPENSE	\$ 414,214	\$ 675,862	\$ 705,793	\$ 768,980	\$ 715,462	\$489,274	\$ 702,903	
Excess of Revenue over Expenses	\$21,998	(\$200,185)	(\$10,248)	(\$11,076)	\$21,830	\$62,332	\$32,656	
Unrestricted Net Assets (beginning of year)	\$358,991	\$380,758	\$180,447	\$170,198	\$159,122	\$170,198	\$159,122	
Unrestricted Net Assets (end of year)	\$380,989	\$180,573	\$170,198	\$159,122	\$180,952	\$232,530	\$191,778	

Explanatory Notes:

- (1) Assumes Two Co-Executive Directors, one @ 5 days per week; one @ 4.5 days per week; plus Managing Matters Admin support
- (2) Amortization of office equipment based on 4 year straight line depreciation

Actual/Forecasted Financial Reserves	2016 Actual	2017 Actuals	2018 Actuals	2019 Budget	2019 Revised Budget (Apr 2019)	2019 Revised Forecast
Minimum 3 months (25%) of Annual Operating Expenses =	\$103,554	\$168,965	\$176,448	\$192,245	\$178,865	\$175,726
Maximum 6 months (50%) of Annual Operating Expenses =	\$207,107	\$337,931	\$352,897	\$384,490	\$357,731	\$351,452
Actual/Forecasted Level of Financial Reserves :	\$380,758	\$180,573	\$170,198	\$159,122	\$180,952	\$191,778
Actual/Forecasted Level of Financial Reserves %:	92%	27%	24%	21%	25%	27%

2019 Operational Budget - Member Dues Breakdown**2018 Member Dues Breakdown**

Upper Tier Member	73,438.00	5	367,190.00
DFS	55,079.00	1	55,079.00
Lower Tier Member	36,719.00	4	146,876.00
Initiation Members	44,000.00	2	88,000.00
Associate	4,800.00	8	38,400.00
			695,545.00

2019 (Base) Member Dues Breakdown

Upper Tier Member	73,438.00	6	440,628.00
Lower Tier Member	36,719.00	4	146,876.00
Initiation Members	44,000.00	3	132,000.00
Associate	4,800.00	8	38,400.00
			757,904.00

**2019 Operational Budget - Member Dues
Breakdown - Revised****2019 Member Dues Breakdown**

Upper Tier Member	73,438	6	440,628.00
National Bank	55,079	1	55,079.00
Lower Tier Member	36,719	3	110,157.00
Initiation Members	44,000	2	88,000.00
Associate	4,800	8.5	40,800.00
			734,664.00

Agenda Item 3(f)
October 29/19 EOC Meeting

CAFII 2020 Schedule of Meetings and Events
(Approved by CAFII Board of Directors at October 1/19 Meeting)

EOC Meetings: *To be held for 2.5 hours in-person or 1.5 hours via teleconference. * In-person meetings bolded.*

- **Tuesday, January 21, 2020** (2:30-5:00 p.m. in person meeting) and EOC Annual Dinner at 5:30 pm
- Tuesday, February 25, 2020 (Teleconference; 2:00 – 3:30 p.m.)
(Family Day stat holiday: Monday, February 17)
- **Tuesday, March 24, 2020** (2:00-4:30 p.m. in person meeting)
(Good Friday, April 10; Easter Monday, April 13)
- Tuesday, April 28, 2020 (Teleconference; 2:00 – 3:30 p.m.)
- **Tuesday, May 26, 2020** (2:00-4:30 p.m. in person meeting)
(Victoria Day stat holiday: Monday, May 18)
- Tuesday, June 23, 2020 (Teleconference; 2:00 – 3:30 p.m.)
(St. Jean Baptiste Day: June 24; Canada Day: July 1)
- Tuesday, July 21, 2020 *tentative summer meeting (Teleconference; 2:00 – 3:30 p.m.)
- Tuesday, August 25, 2020 *tentative summer meeting (Teleconference; 2:00 – 3:30 p.m.)
(Civic Stat Holiday: August 3)
- **Tuesday, September 22, 2020** (2:00-4:30 p.m. in person meeting)
(Rosh Hashanah: September 18 – September 20; Yom Kippur: September 27– September 28)
- Tuesday, October 20, 2020 (Teleconference; 2:00 – 3:30 p.m.)
(Thanksgiving Stat Holiday: October 12)
- **Tuesday, November 17, 2020** (2:00-4:30 p.m. in person meeting)

Board Meetings:

- **Tuesday, April 7, 2020** (2:20 to 4:00 p.m. abbreviated Board meeting, following informal liaison lunch and Industry Issues Dialogue with the AMF)
HOST: Desjardins Financial Security in Levis/Quebec City
- **Tuesday, June 9, 2020** (2:00-5:00 p.m.; followed by Reception)
HOST: Canada Premier Life/ Valyeo
- **Tuesday, October 6, 2020** (2:00-5:00 p.m.; followed by Reception) HOST: Assurant
- **Tuesday, December 1, 2020** (2:00-5:00 p.m.; followed by Reception) HOST: CIBC Insurance

Annual Members Luncheon & Speaker Forum 2020:

Date: Tuesday, March 3, 2020 from 11:45 a.m. to 2:15 p.m.

2019 Board meetings Hosted by:

CUMIS (National Club), Manulife, National Bank, TD

2018 Board Meetings Hosted by:

CAFI; ScotiaLife ; BMO; The Canada Life Assurance

2017 Board Meetings Hosted by:

TD Insurance; CAFI; Desjardins; CIBC Insurance

2016 Board Meetings Hosted by:

CUMIS Group; Assurant Solutions; RBC Insurance; BMO Insurance

2015 Board Meetings Hosted by:

CIBC Insurance; ScotiaLife Financial; Desjardins; Canadian Premier

Past Years

Annual Members Luncheon & Speaker Forum 2019:

Date: Tuesday, February 19, 2019 from 11:45 a.m. to 2:15 p.m.

Topic: "The Changing Regulatory Environment – Challenges, Risks and Opportunities"

Panelists: Stuart Carruthers, Partner, Stikeman Elliott LLP, Koker Christensen, Partner, Fasken, Jill McCutcheon, Partner, Torys LLP. Panel Moderator: Nicole Benson, CEO, Canadian Premier Life / valeyo

Venue: Arcadian Loft, 401 Bay St., Simpson Tower, 8th Floor, Toronto, ON

Annual Members Luncheon & Speaker Forum 2018

Topic: "Leading For Success in A Volatile World"

Speaker: Richard Nesbitt, CEO, the Global Risk Institute

Venue: Arcadian Loft, 401 Bay St., Simpson Tower, 8th Floor, Toronto, ON

Annual Members Luncheon & Speaker Forum 2017

Topic: Tomorrow is Today: Insurtech Disruption in the Life and Health Insurance Sector

Speaker: Keegan Iles, Director, Insurance Consulting Leader, PwC Canada

Venue: Arcadian Loft, 401 Bay St., Simpson Tower, 8th Floor, Toronto, ON

Annual Members Luncheon & Speaker Forum 2016

Topic: Innovation in Insurance: Opportunities in a Changing Market

Speaker: Alison Salka, Ph.D, Senior Vice President and Director Research, LIMRA

Venue: Arcadian Loft, 401 Bay St., Simpson Tower, 8th Floor, Toronto, ON

Agenda Item 3(g)
October 29/19 EOC Meeting

Board-Approved Decision To Enhance The Benefits/Value Proposition Of CAFII Associate Status

From: Brendan Wycks and Keith Martin, Co-Executive Directors

Date: June 24, 2019

To: Executive Operations Committee

Subject: Proposal To Enhance The Benefits/Value Proposition Of CAFII Associate Status

With a view to enhancing and sweetening the benefits and value proposition of CAFII Associate Status, we recommend that, effective with September 2019, “receipt of the CAFII Regulatory Update” be added to the list of Associate benefits.

In extending this benefit to existing and future CAFII Associates, CAFII would reserve the right to issue a modified/abbreviated version of the Regulatory Update to Associates, to accommodate the expected-to-be-rare situation where one or more content items in a Regulatory Update is deemed to be of a particularly sensitive nature and therefore proprietary to Members of the Association.

Background Rationale: At present, CAFII Associate Status can be characterized as solely a “moral supporter and social interaction affiliate”-type of status which is open to suppliers to the financial institutions in insurance sector. More specifically, the benefits of Associate Status consist solely of invitations to three CAFII Receptions and the Annual Members’ Luncheon each year, to which Associates are entitled to bring up to five representatives to each event.

By adding “receipt of the CAFII Regulatory Update” – as a regularly produced industry insights and intelligence Report -- to the list of Associate benefits, we believe that CAFII will be able to

- attract more relevant supplier/industry affiliate-type organizations into CAFII Associate Status (particularly some prospects who have been “sitting on the fence”);
- reduce the rate of attrition among CAFII Associates, which has been in the range of 20% to 25% per annum over the past few years; and
- gradually over time, increase the CAFII Associate Annual Dues, based on greater perceived and experienced value for Associates.

Agenda Item 3(i)
October 29/19 EOC Meeting

Next CAFII Board Meeting on December 3/19 and Guest Speaker at Ensuing CAFII Reception: Melissa Carruthers, Monitor Deloitte Canada



Melissa Carruthers is a Senior Manager within Monitor Deloitte's Strategy Consulting practice where she leads its Life and Health Insurance Strategy and Transformation offerings in Canada.

Melissa joined Deloitte after working a number of years as a life and annuities actuary in both the direct insurance and reinsurance industries. Her breadth of prior industry experience includes roles in pricing and product development as well as corporate actuarial and biometric research.

In her current role as a strategy and transformation advisor, she works with a number of the leading Canadian life and health insurance companies and financial institutions as they define their strategic priorities across multiple layers within the organization -- with a particular focus on corporate, product, and distribution strategy.

Melissa is a frequent speaker at industry events on topics such as the future of life and health insurance; and the application of emerging technologies within insurance operations.

She is a Fellow of the Society of Actuaries and a Fellow of the Canadian Institute of Actuaries.

Agenda Item 4(a)
October 29/19 EOC Teleconference Meeting

October 28/19 CAFII Education and Dialogue Meeting With FCAC Staff Executives

From: Caroline Patenaude (FCAC/ACFC) <Caroline.Patenaude@fcac-acfc.gc.ca>

Sent: October-09-19 1:25 PM

To: Brendan Wycks <brendan.wycks@cafii.com>

Cc: Keith Martin <Keith.Martin@cafii.com>; Judith Robertson (FCAC/ACFC) <Judith.Robertson@fcac-acfc.gc.ca>; Teresa Frick (FCAC/ACFC) <Teresa.Frick@fcac-acfc.gc.ca>; Jeremie Ryan (FCAC/ACFC) <Jeremie.Ryan@fcac-acfc.gc.ca>

Subject: RE: CAFII Request For Get-Acquainted and Dialogue Meeting With FCAC Commissioner Judith Robertson and Other FCAC Staff Executives

Hello Mr. Wycks,

Thank you for your response. I spoke with Mrs. Robertson and there's no problem meeting from 10:45 to 12:00 on October 28th. I will send out a first meeting invitation, and once you know who the CAFII participants will be and have the agenda, I can amend the invitation accordingly.

We are located at 427 Laurier Ave. West, on the 6th floor. Once you arrive, please check-in with my colleagues at the reception and I will escort you to the boardroom.

Thank you,

Caroline

Caroline Patenaude

Administrative Assistant, Corporate Services
Financial Consumer Agency of Canada / Government of Canada
Caroline.Patenaude@fcac-acfc.gc.ca /Tel: 613-298-9769

From: Brendan Wycks <brendan.wycks@cafii.com>

Sent: Wednesday, October 9, 2019 12:09 PM

To: Caroline Patenaude (FCAC/ACFC) <Caroline.Patenaude@fcac-acfc.gc.ca>

Cc: Keith Martin <Keith.Martin@cafii.com>; Judith Robertson (FCAC/ACFC) <Judith.Robertson@fcac-acfc.gc.ca>; Teresa Frick (FCAC/ACFC) <Teresa.Frick@fcac-acfc.gc.ca>; Jeremie Ryan (FCAC/ACFC) <Jeremie.Ryan@fcac-acfc.gc.ca>

Subject: RE: CAFII Request For Get-Acquainted and Dialogue Meeting With FCAC Commissioner Judith Robertson and Other FCAC Staff Executives

Good morning and thanks very much, Caroline.

I'm pleased to confirm that the morning of Monday, October 28/19 works well for a small delegation of CAFII representatives to meet with FCAC Commissioner Judith Robertson and Directors Teresa Frick and Jeremie Ryan at the Agency's office in Ottawa.

We ask that the meeting be scheduled for 10:30 a.m. to 12 Noon (or from 10:45 a.m. to 12 Noon if the Commissioner is not available to meet for a full 90 minutes), which will allow most of our CAFII participants to fly from Toronto to Ottawa that morning.

Please confirm the exact time and duration of the October 28/19 meeting and the FCAC's office address in Ottawa (and any arrival/check-in instructions) at your earliest convenience.

On or before Monday, October 21, CAFII will be in a position to send Ms. Robertson, Ms. Frick, and Mr. Ryan the names and company affiliations of those who'll be part of our small CAFII delegation; and a draft agenda for the Get-Acquainted and Dialogue Meeting, for their review and feedback.

Brendan Wycks, BA, MBA, CAE

Co-Executive Director

Canadian Association of Financial Institutions in Insurance

From: Caroline Patenaude (FCAC/ACFC) <Caroline.Patenaude@fcac-acfc.gc.ca>

Sent: October-09-19 8:54 AM

To: Brendan Wycks <brendan.wycks@cafii.com>

Subject: FW: CAFII Request For Get-Acquainted and Dialogue Meeting With FCAC Commissioner Judith Robertson and Other FCAC Staff Executives

Hello M. Wycks,

Would you have availability to meet with Commissioner Robertson and two of our Directors on Monday October 28th? Currently they are all available between 9AM to 12PM.

Thank you,

Caroline

Caroline Patenaude

Administrative Assistant, Corporate Services

Financial Consumer Agency of Canada / Government of Canada

Caroline.Patenaude@fcac-acfc.gc.ca /Tel: 613-298-9769

From: Judith Robertson (FCAC/ACFC)
Sent: Tuesday, October 8, 2019 4:30 PM
To: Ann-Marie Epps (FCAC/ACFC) <Ann-Marie.Epps@fcac-acfc.gc.ca>; Werner Liedtke (FCAC/ACFC) <Werner.Liedtke@fcac-acfc.gc.ca>; Teresa Frick (FCAC/ACFC) <Teresa.Frick@fcac-acfc.gc.ca>; Jeremie Ryan (FCAC/ACFC) <Jeremie.Ryan@fcac-acfc.gc.ca>
Cc: Marilyn Leblanc (FCAC/ACFC) <Marilyn.Leblanc@fcac-acfc.gc.ca>; Caroline Patenaude (FCAC/ACFC) <Caroline.Patenaude@fcac-acfc.gc.ca>; Emilie Rene (FCAC/ACFC) <Emilie.Rene@fcac-acfc.gc.ca>
Subject: RE: CAFII Request For Get-Acquainted and Dialogue Meeting With FCAC Commissioner Judith Robertson and Other FCAC Staff Executives

Thanks Ann-Marie, your team has been very helpful.

The only date I could be available that they have listed is Monday, October 28th.

Caroline, can you please check with Teresa and Jeremie and see if they are available for a meeting that date? If so, please respond to Brendan Wycks directly to set up the meeting. One hour should be enough. Jeremie and Teresa can invite anyone else they like.

Thanks,
Judith

From: Ann-Marie Epps (FCAC/ACFC)
Sent: October 7, 2019 3:13 PM
To: Judith Robertson (FCAC/ACFC) <Judith.Robertson@fcac-acfc.gc.ca>; Werner Liedtke (FCAC/ACFC) <Werner.Liedtke@fcac-acfc.gc.ca>; Teresa Frick (FCAC/ACFC) <Teresa.Frick@fcac-acfc.gc.ca>; Jeremie Ryan (FCAC/ACFC) <Jeremie.Ryan@fcac-acfc.gc.ca>
Cc: Marilyn Leblanc (FCAC/ACFC) <Marilyn.Leblanc@fcac-acfc.gc.ca>; Caroline Patenaude (FCAC/ACFC) <Caroline.Patenaude@fcac-acfc.gc.ca>; Emilie Rene (FCAC/ACFC) <Emilie.Rene@fcac-acfc.gc.ca>
Subject: FW: CAFII Request For Get-Acquainted and Dialogue Meeting With FCAC Commissioner Judith Robertson and Other FCAC Staff Executives

Good afternoon,

We have received a request from Brendan Wycks, the Co-Executive Director of the Canadian Association of Financial Institutions in Insurance (CAFII) to meet with you for 90 minutes.

During this time, he would like to:

- Have a meet and greet;
- Have an update dialogue on regulatory matters of mutual interest;
- Make a brief overview presentation on the Authorized Insurance Products;

- Share the results of recent research conducted by Pollara Strategic Insights on consumers' experiences and satisfaction with credit protection insurance and travel health insurance.

Commissioner, if you would like for me to respond on your behalf as you presently work to staff your EA position, I am happy to do so.

Regards,
Ann-Marie

From: Brendan Wycks

Sent: July-29-19 6:31 PM

To: judith.robertson@fsrao.ca

Cc: Keith Martin <Keith.Martin@cafii.com>; werner.liedtke@fcac-acfc.gc.ca; jane.rooney@fcac-acfc.gc.ca; teresa.frick@fcac-acfc.gc.ca; Melanie Leroux (FCAC/ACFC) <Melanie.Leroux@fcac-acfc.gc.ca>; Kathryn Martin (FCAC/ACFC) <Kathryn.Martin@fcac-acfc.gc.ca>; info@fcac-acfc.gc.ca

Subject: Congratulations From CAFII On Your Appointment As Commissioner Of The Financial Consumer Agency Of Canada

July 29, 2019

Ms. Judith Robertson

Commissioner-Designate, Financial Consumer Agency of Canada (FCAC)

427 Laurier Avenue West, 6th Floor

Ottawa ON K1R 5C7

judith.robertson@fsrao.ca

Dear Ms. Robertson:

The Canadian Association of Financial Institutions in Insurance (CAFII) extends hearty congratulations on your recent appointment as Commissioner of Financial Consumer Agency of Canada (FCAC) and best wishes for much success in that critically important regulator CEO role.

We applaud Finance Minister Morneau's selection decision, as your strong background as a Commissioner/Board member with financial services regulatory organizations coupled with your extensive private sector leadership experience constitute an ideal background for leading the FCAC through the vitally important next phase in its mandate as regulator of federally regulated financial institutions (FRFIs).

The FCAC is a key regulator for CAFII because many of our members are distributors of creditor's group insurance and travel insurance as "Authorized Insurance Products" – through banks and federally incorporated credit unions – under the federal Bank Act and the related Insurance Business (Banks and Bank Holding Companies) Regulations (IBBRs).

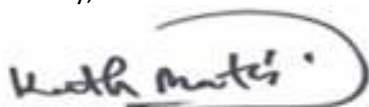
Our Association has therefore had regular liaison and dialogue with the FCAC over the years, including those meetings set out in Appendix A to this letter for your information.

In that connection, a secondary purpose of this letter is to advise that CAFII would like to arrange a get-acquainted and dialogue meeting with you and other FCAC staff executives, as appropriate, sometime this Fall after you have had time to settle into your new role as Commissioner.

Given that the Minister's announcement of your appointment indicated that your start date as Commissioner would be 19 August, 2019, we will therefore follow-up with your office in late September, with a view to arranging a meeting with you and key team members sometime in October or November at the Agency's Ottawa office. We would like to secure a meeting of approximately 90 minutes duration. In that meeting, in addition to getting more fully acquainted and having an update dialogue on regulatory matters of mutual interest, CAFII would like to make a brief overview presentation on the Authorized Insurance Products which our members offer to consumers, and also share the results of recent research conducted by Pollara Strategic Insights (which is also FSRA's polling/survey research provider) on consumers' experiences and satisfaction with credit protection insurance and travel health insurance.

We look forward to meeting with you in your new leadership role as Commissioner of the Financial Consumer Agency of Canada.

Sincerely,



Keith Martin, Co-Executive Director, CAFII
647.460.7725



Brendan Wycks, Co-Executive Director, CAFII
647.218.8243

Appendix A

Recent CAFII Meetings and Interactions With Financial Consumer Agency of Canada (FCAC)

As At July 2019

- January 2011: CAFII presentation to FCAC staff on "Fundamentals of Creditor's Group Insurance" at FCAC office in Ottawa.
- January 9, 2014: Get re-acquainted/refresh meeting between FCAC Consumer Education Officers Michael Olson and Karen Morgan and CAFII representatives Brendan Wycks, Executive Director, and Moira Gill, Executive Operations Committee member from TD Insurance, at FCAC office in Ottawa
- February 28, 2014: CAFII makes response submission on FCAC consultation on proposed development and implementation of a comprehensive financial consumer code
- June 10, 2014: CAFII Reception event with Brigitte Goulard, FCAC Deputy Commissioner, as guest speaker, at One King West Hotel, Toronto
- February 10, 2015: CAFII Annual Members' Luncheon with Jane Rooney, Canada's National Financial Literacy Leader at FCAC, as guest speaker, at Arcadian Loft, Toronto
- May 1, 2015: CAFII Executive Director Brendan Wycks introduces himself to FCAC Commissioner Lucie Tedesco, and they have a get acquainted chat following her FCAC Update presentation at CLHIA Compliance and Consumer Complaints Conference in Quebec City

- June 12, 2018: CAFII purchases a table for Economic Club of Canada luncheon with Lucie Tedesco, FCAC Commissioner, as guest speaker, at Royal York Hotel, Toronto. CAFII Co-Executive Directors Brendan Wycks and Keith Martin chat with Lucie Tedesco and Brigitte Goulard, Deputy Commissioner, following Ms. Tedesco's presentation focused on the May 2018 FCAC "Domestic Bank Retail Sales Practices Review" Report
- September 14, 2018: FCAC Presentation and Dialogue Meeting (focused on CAFII-relevant insights arising from the May 2018 FCAC "Domestic Bank Retail Sales Practices Review" Report) between Brigitte Goulard, Deputy Commissioner, and CAFII Board of Directors and Executive Operations Committee members, at CIBC Insurance, Toronto
- March/April 2019: CAFII makes response submissions on FCAC's proposed "Credit or Loan Insurance" and "Credit Card Balance Insurance" consumer education materials (website content)

Brendan Wycks, BA, MBA, CAE

Co-Executive Director

Canadian Association of Financial Institutions in Insurance

Brendan.wycks@cafii.com

T: 647.218.8243

Alternate T: 647.361.9465

www.cafii.com

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Agenda Item 4(b)
October 29/19 EOC Meeting

CAFII 2019 Western Canada Insurance Regulators and Policy-Makers Visits Tour

- Monday, October 21/19 (federal election day in Canada): fly to Winnipeg in late afternoon or early evening.
-stay at downtown Winnipeg hotel.

Recommended Flights from Toronto to Winnipeg

- Air Canada 265; Depart: 2:20 p.m.; Arrive: 3:57 p.m.
- Air Canada 267; Depart: 4:20 p.m.; Arrive: 5:57 p.m.
- Air Canada 269; Depart: 7:15 p.m.; Arrive: 8:52 p.m.
- Air Canada 271; Depart: 10:50 p.m.; Arrive: 12:27 a.m. on Tuesday, October 22/19
- Westjet 525; Depart: 3:45 p.m.; Arrive: 5:20 p.m.
- Westjet 529; Depart: 6:15 p.m.; Arrive: 7:51 p.m.
- Westjet 535; Depart: 10:15 p.m.; Arrive: 11:51 p.m.

Recommended Winnipeg Hotels

- Alt Hotel Winnipeg
- Holiday Inn and Suites Winnipeg Downtown
- Fort Garry Hotel
- Radisson Hotel Winnipeg Downtown
- Best Western Plus Downtown Winnipeg

- Tuesday, October 22/19, Winnipeg:
 - 8:00 to 9:20 a.m. **(confirmed)**: Breakfast and Rendez-Vous/Prep Meeting. Location: Orange Room, ALT Hotel, 310 Donald St., Winnipeg; 431-800-4279.
 - 9:30 a.m. to 11:30 a.m. **(confirmed)**: liaison meeting with Insurance Council of Manitoba Executive Director Barbara Palace Churchill, ICM staff executives Lee Roth and Stacey Aubrey, Superintendent of Insurance Scott Moore, and possibly other Financial Institutions Regulation Branch (FIRB) staff executives. Location: Orange Room, ALT Hotel, 310 Donald St., Winnipeg; 431-800-4279.
 - 11:45 a.m. to 12:45 p.m. **(confirmed)**: lunch for CAFII delegation at Bailey's Restaurant & Lounge, 185 Lombard Avenue, Winnipeg; 204-944-1180.
- Tuesday afternoon or evening, October 22/19: fly from Winnipeg to Regina.
-stay at downtown Regina hotel.

Recommended Flight from Winnipeg to Regina

- Westjet 739 (connecting flights); Depart: 2:05 p.m.; Arrive Calgary: 3:15 p.m.;
Depart Calgary: 4:05 p.m.; Arrive Regina: 5:35 p.m.

Recommended Regina Hotels

- Sandman Hotel & Suites Regina
- Royal Hotel Regina, Trademark Collection By Wyndham
- Holiday Inn Hotel & Suites Regina
- Ramada Plaza by Wyndham Regina Downtown
- Holiday Inn Express Hotel & Suites Regina
- Residence Inn by Marriott Regina
- Wingate by Wyndham Regina

2. Wednesday, October 23/19, Regina:

-8:00 to 9:15 a.m. **(confirmed)**: Continental Breakfast and Rendez-Vous/Prep Meeting at The Co-operators Group Office, 1920 College Avenue, Regina; 306-527-4493 (Shawna Sykes) or 306-347-6434.

-9:30 a.m. to 11:00 a.m. **(confirmed)**: liaison meeting with Saskatchewan Superintendent of Insurance Roger Sobotkiewicz; Jan Seibel, Director, Insurance and Real Estate Division, Financial and Consumer Affairs Authority; and other FCAA staff executives at FCAA office, #601 - 1919 Saskatchewan Drive, Regina; (306) 787-2953 (Jan Seibel).

-11:30 a.m. to 12:40 p.m. **(confirmed)**: informal lunch for CAFII delegation at The Co-operators Group Office, 1920 College Avenue, Regina; 306-527-4493 (Shawna Sykes) or 306-347-6434.

-1:00 to 2:30 p.m. **(confirmed)**: liaison meeting with Ron Fullan, Executive Director; April Stadnek, Director, Strategic Initiatives; other ICS staff; and Life Insurance Council members, as appropriate, at ICS office, #310 - 2631 28th Avenue, Regina.

-3:00 to 4:00 p.m. **(confirmed)**: get acquainted and dialogue meeting with Glen Gardner, QC, Deputy Minister of Justice and Deputy Attorney General Glen Gardner and possibly other officials from Ministry of Justice, responsible for oversight of FCAA and insurance policy development in Saskatchewan, at 10th Floor Boardroom, 1874 Scarth Street, Regina; (306-787-5352 for Anna McCashin, Senior Administrative Assistant; or 306-787-6268 for Shannon Williams, Executive Assistant).

- Wednesday evening, October 23/19: fly from Regina to Edmonton
 -stay at downtown Edmonton hotel.

Recommended Flight from Regina to Edmonton

-Westjet 3263 (direct flight); Depart: 5:25 p.m.; Arrive: 7:04 p.m.

Recommended Edmonton Hotels

- Holiday Inn Express Downtown Edmonton
- Union Bank Inn
- Coast Edmonton Plaza Hotel By APA
- Chateau Lacombe Hotel
- Matrix Hotel Downtown Edmonton
- Comfort Inn & Suites Downtown Edmonton

3. Thursday, October 24/19, Edmonton:

-8:00 to 9:20 a.m. **(confirmed)**: Breakfast and Rendez-Vous/Prep Meeting at Cora's Breakfast and Lunch restaurant in Days Inn By Wyndham Edmonton Downtown, 10041 106 St. NW, Edmonton; 780-429-7903.

-9:30 to 10:45 a.m. **(confirmed)**: meeting with Darren Hedley, Assistant Deputy Minister, Financial Sector Regulation and Policy and Superintendent of Insurance; David Sorensen, Deputy Superintendent of Insurance; Laurie Balfour, Director, Financial Compliance, Insurance Regulation and Market Conduct Branch; and Wayne Maday, Director, Insurance Policy, Alberta Treasury Board and Ministry of Finance, at Terrace Building, 9515 - 107 Street, Edmonton, 428 Wildrose Boardroom.

-11:00 a.m. to 12 Noon **(tentative)**: meeting with Grant Hunter, Associate Minister of Red Tape Reduction and/or associated Alberta Treasury Board and Finance officials.

-12:15 to 1:45 p.m. **(confirmed)**: lunch for CAFII delegation at Chop Steakhouse & Bar, 10235 101 St., Edmonton; 780-441-3075.

-2:00 to 3:30 p.m. **(confirmed)**: meeting with Joanne Abram, CEO, Alberta Insurance Council; Sylvia Boyetchko, Director of Licensing; Sharan Dhalla, Director of Compliance; Zabeeda Yaqoob, Director of Legal & Regulatory Affairs; and Heath Young, Director of Information Technology & Business Services, at AIC's Edmonton office, Suite 600, 10104 - 103 Avenue, Edmonton.

- Thursday evening, October 24/19: fly from Edmonton to Victoria, BC.

-stay at downtown Victoria hotel.

Recommended Flights from Edmonton to Victoria

-Westjet 173 (direct flight); Depart: 6:10 p.m.; Arrive: 6:49 p.m.

-Westjet 199 and 3185 (connecting flights); Depart: 8:45 p.m.; Arrive Vancouver: 9:21 p.m.; Depart Vancouver: 10:00 p.m.; Arrive Victoria: 10:34 p.m.

Recommended Victoria Hotels

-Harbour Haven Downtown

-Victoria Regent Waterfront Hotel & Suites

-Hotel Rialto

-Helms Inn

-Chateau Victoria Hotel and Suites

-Capital CityCentre Hotel

4. Friday, October 25/19, Victoria, BC followed by Vancouver, BC:

-7:00 to 8:10 a.m. **(confirmed)**: Breakfast and Rendez-Vous/Prep Meeting at Cora's Breakfast, 850 Douglas St., #150, Victoria, BC; (250) 381-2672.

-8:30a.m. to 10:00 a.m. **(confirmed)**: meeting with BC Ministry of Finance staff executive Kari Toovey, project lead, and colleagues re policy change recommendations emerging from 10-Year Review of Financial Institutions Act, at BC Ministry of Finance office, 617 Government St., TBS Boardroom, Victoria. (Contacts: Kari Toovey – 778-698-5262; Gina Wong – 778-698-5272).

- 10:15 to 11:00 a.m., Friday, October 25/19: cab ride (5 minutes) to Victoria Harbour (downtown) and fly to Vancouver Harbour (downtown) on 11:00 a.m. helijet flight (www.helijet.com: \$350 per person one-way, inclusive of taxes and with generous baggage allowance); arrive at Vancouver Harbour at 11:35 a.m.
- 12 Noon to 1:30 p.m. **(confirmed)**: lunch for CAFII delegation at Italian Kitchen restaurant, 1037 Alberni St., Vancouver; 604-687-2858.
- 1:45 to 3:00 p.m. **(confirmed)**: meeting with Blair Morrison, new CEO of FICOM/BCFSA (appointed June 22/19), and other staff executives possibly including Frank Chong, Chris Carter, Michael McTavish, Lorena Dimma, and Harry James, at BCFSA office, 28th Floor, 555 West Hastings St., Vancouver.
- 3:30 to 4:45 p.m. **(confirmed)**: meeting with Janet Sinclair, Executive Director, Insurance Council of BC; Kandace Hopkins, Director, Practice & Quality Assurance; Brett Thibault, Director, Governance and Stakeholder Engagement; and possibly some Insurance Council members at Insurance Council of British Columbia office, #300 - 1040 West Georgia St., Vancouver.
- Friday evening, October 25/19: fly from Vancouver to home cities.

Agenda Item 4(c)
October 29/19 EOC Meeting

Board-Mandated External Counsel Legal Opinion On AMF Directive To Cancel And Remove Existing/In-Force Credit Protection Insurance Coverage From Non-Debtor Spouses

From: Keith Martin <Keith.Martin@cafii.com>

Sent: October-16-19 1:21 PM

To: CAFII Board Members and Surrogates

Subject: Next Steps on CAFII Engaging a Quebec-Based Lawyer to Offer a Legal Opinion on the Cancellation of In-Force Certificates

Background

The CAFII Board has asked CAFII to engage a Quebec-based “heavy hitter” lawyer to challenge the AMF’s position that existing, in-force insurance policies that do not meet the interpretation of “spousal pecuniary interest” have to be cancelled over time.

Based on consultations with the Board and other CAFII members, we have concluded that the best external legal counsel to approach for this engagement is Marc Duquette, of Norton Rose. <https://www.nortonrosefulbright.com/en-ca/people/120978>

Concerns Raised and Mitigating Actions Taken

There was concern expressed that such a legal opinion, especially if presented in written form to the AMF, could be discoverable. That issue was discussed with members, including their internal legal counsel, at a teleconference call on 16 October, 2019 from 12.00-12.30pm.

To mitigate against this risk, it was agreed that CAFII will ask the legal counsel for his views on the risks of moving forward on this initiative, the option of a Common Interest Privilege and Joint Defence Agreement, and his opinion on whether a written submission should be made to the AMF, or just a verbal submission. It was also noted that CAFII members (this distribution list) will be consulted as we move forward, including a review of any written documentation developed prior to it being shared externally in any way.

It was also agreed that we should not ask for legal counsel to develop arguments on the potential “legal implications” of cancelling existing policies. Instead, we will ask him to develop arguments along the following lines:

“The issue on which we will be seeking to have a legal opinion crafted is the legality/correctness of the legislative and regulatory interpretation underlying the AMF’s directive that affected credit protection insurers must cancel and remove existing/in-force spousal coverage from non-debtor spouses, where the creditor’s pecuniary interest in the life and/or health of the spouse cannot be demonstrated to the AMF’s satisfaction.”

There was also some discussion about whether we can make a compelling legal argument countering the AMF expectation that policies will be cancelled, without challenging the more fundamental issue of the AMF's general interpretation for demonstrating the pecuniary interest of a spouse. We will ask the legal counsel for his views on that. While the focus of this exercise is around cancellation of existing policies, we will also ask legal counsel to offer an opinion on the interpretation of the AMF of Section 76 with respect to this issue.

Next Steps

Given the sensitivity of the issues at hand, CAFII members will be consulted regularly as we move forward.

As a first step, please email me if you have any concerns with the general direction being proposed in this note by **Thursday, 17 October, at noon.**

If there are no concerns or show-stoppers, Marc Duquette will be approached with the general instructions noted above, and he will be asked to produce a proposal that indicates how he will address our questions, that includes his recommended approach, which identifies timelines, and which includes a preliminary quote.

After receiving that from Mr. Duquette, it will be circulated to those on this distribution list. A conference call will likely then be called to discuss that document.

If we then proceed, I would propose a teleconference call with Mr. Duquette and those on this distribution list, to discuss more fully the issues and possible legal arguments to be developed, and to provide him with additional background and context. Before any major decision is made, like providing the AMF with a submission either written or verbal, members on this distribution list will be consulted.

On the matter of language, I realize many members including their legal counsel may not be fluent in French; however, I believe that the written materials Mr. Duquette will produce will be largely in French. In those cases, I will send the original French documentation with a English translation that I will produce.

Any questions or concerns, please let me know.

--Keith

Keith Martin

Co-Executive Director / Co-Directeur général

Canadian Association of Financial Institutions in Insurance

L'association canadienne des institutions financières en assurance

keith.martin@cafii.com

T: 647.460.7725

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Agenda Item 4(d)
October 29/19 EOC Teleconference Meeting

AMF Review of Critical Illness Insurance

From: Joan Weir <JWeir@clhia.ca>

Sent: September 15, 2019 1:28 PM

To: Working Group on CI Regulatory Activity (AMF)

Subject: Quebec Update - AMF oversight of CI product

To: Members of the Working Group on CI Regulatory Activity (AMF)

My colleague working with the AMF on many initiatives has provided the following update on the subject of its upcoming review of the Critical Illness product, and it looks like insurers selling this product in Quebec will hear from AMF this coming week.

Regards,
Joan, Director, Health and Disability Policy

Critical illness

In light of recent media attention to Critical illness (CI) insurance, consumer complaints, and based on information obtained through the CCIR annual statement and the questionnaire on group disability claims management, the AMF wants to have a clear picture of CI offering. They are concerned, among other things, about product complexity and the technical language used in consumer literature. They wonder whether consumers receive the information they need to make sound decisions.

We have now learned that the AMF will proceed as follows:

- it will be an industry-wide enforcement initiative similar to that undertaken with respect to the management of disability claims in group insurance
- it will be a two-fold initiative:
 - o global survey aiming 16 insurers: gathering of data from insurers to get a clear picture of the CI insurance market (e.g. sales volumes/claims made, claims/premiums ratios) as well as qualitative information including reasons for claims/refusals, and complaints relating to this product
 - o targeted quantitative and qualitative questionnaire aiming 10 insurers representing 90% of the CI insurance market in Quebec: The AMF seems to believe that the insurers targeted by its disability insurance initiative would most likely be those involved in the CI initiative. The AMF indicates that the questionnaire would not be as bulky as the one on disability insurance.
- traditional distribution as well as alternate distribution will be targeted
- the AMF will send a letter to the targeted insurers during the week of September 16, 2019
- the AMF provided the CLHIA with a copy of their template correspondence and the list of insurers targeted.

Next steps: CLHIA is seeking counter-arguments to the possible AMF conclusion that low claims/premiums ratio indicate unsuitability of the product (similar to spousal coverage initiative).

Agenda Item 4(e)
October 29/19 EOC Meeting

AMF Position On Embedded Creditor's Group And Travel Insurance Coverages

From: Thorn, Peter <Peter.Thorn@td.com>
Sent: October-11-19 5:59 PM
To: Brendan Wycks <brendan.wycks@cafii.com>; Keith Martin <Keith.Martin@cafii.com>
Subject: Embedded Travel Insurance Coverages

Hi, Keith and Brendan.

Was there any written direction from the AMF on the issue of providing a Distribution Guide or Product Summary/Fact Sheet for embedded travel coverages? Or was it simply a verbal statement? Do you know exactly what was said?

Thanks!
Pete

From: Brendan Wycks
Sent: October-15-19 8:46 AM
To: Thorn, Peter <Peter.Thorn@td.com>; Keith Martin <Keith.Martin@cafii.com>
Cc: 'afzal.baig@td.com' <afzal.baig@td.com>
Subject: Credit-Card Embedded Travel Insurance Coverage

Hi, Pete.

Here is our response to the question you've asked, which Keith has prepared on behalf of us both.

Our understanding is that CLHIA/ACCAP's Michele Helie, in a regularly-scheduled call with the AMF's Mario Beaudoin, was told by Mr. Beaudoin that the AMF expects that for all credit card insurance coverages, even if embedded and for which no direct premium is being paid, the consumer/insured must receive a Fact Sheet and Product Summary.

Michele told Brendan and me, in a regular teleconference update discussion, that she would never have asked Mario the question on this matter, but he simply stated/asserted this information in the course of their conversation. And when he did, she was obliged to share the information with CLHIA/ACCAP members. She said that Mario blurted this out without prompting.

Also, this was verbal only—no written direction on this issue has been received from the AMF to this point in time.

Trust this helps.

Brendan Wycks, BA, MBA, CAE

Co-Executive Director

Canadian Association of Financial Institutions in Insurance

Brendan.wycks@cafii.com

T: 647.218.8243

Alternate T: 647.361.9465

www.cafii.com

Related Issue/Matter From September 24/19 CAFII EOC Meeting

A CAFII Member has raised the following considerations:

- (i) with the exception of some Quebec insurers, traditionally a Distribution Guide has not been required for the credit card-embedded insurance coverages.
- (ii) the AMF has not issued a formal communication to confirm whether or not it will require, under Quebec's new regulatory regime (RADM), a Fact Sheet and Summary to be provided to consumers with respect to credit card-embedded insurance coverages.
- (iii) the preferred approach is to influence the AMF to exempt credit card-embedded insurance coverages from the Fact Sheet and Summary document requirement
- (iv) If the AMF intends to enforce the provision of a Fact Sheet and Summary document with respect to credit card-embedded coverages, then we should be requesting an 1 to 2 year extension to implement the required Fact Sheet and Summary document (current deadline – June 13, 2020).

CLHIA/ACCAP has chosen not to raise this with the AMF because there is no consensus among its members that so asking is desirable, partly because some members have interpreted the Regulation Respecting Alternative Distribution Methods as **not** requiring a Fact Sheet and Summary for embedded coverages; some of these members prefer to operate on that basis until such time as the AMF suggests otherwise.

The risk to asking is that we may not like the answer. On the other hand, clarity is desirable. CAFII's options are:

- (v) make an industry Association ask of the AMF on this issue;
- (vi) instead of asking, provide a view to the AMF as to why embedded coverages should not require a Fact Sheet and Summary;
- (vii) do not ask the AMF and let individual companies take their preferred actions, with some potentially asking the AMF on a company specific-basis.

Agenda Item 4(f)
October 29/19 EOC Meeting

Memorandum

From: Martin Boyle, EOC Chair and Co-Chair, CAFII Working Group on Credit Protection Insurance Industry Best Practices
Karyn Kasperski, Co-Chair, Working Group on Credit Protection Insurance Best Practices
To: CAFII Board of Directors
Date: 27 September, 2019
RE: **Progress Report on CAFII Working Group on Credit Protection Insurance Industry Best Practices**

Background

At the 4 June 2019 Board meeting, the Board's *in camera* session discussion on the Credit Card Balance Protection Insurance (CCBPI) Special Project concluded with a request that a Working Group of the EOC/CAFII membership be created to identify areas where industry practices could be elevated.

CAFII EOC members were invited to participate in this Working Group, or to nominate non-EOC members to participate. The first meeting of the Working Group was held on 15 August, 2019 and the Working Group has been meeting weekly since then.

Martin Boyle, as Board Secretary and EOC Chair, was in attendance at the Board's *in camera* session and chaired the first meeting of the Working Group on 15 August, 2019.

Update on Direction of the Working Group

At the first meeting of the CAFII Working Group on Credit Protection Insurance Industry Best Practices ("Working Group"), several process and strategic issues were considered and it was decided that the Working Group would have two Co-Chairs, Martin Boyle and Karyn Kasperski.

Members of the Working Group received copies of key regulatory documents that set out the market conduct expectations of regulators with respect to credit protection insurance. The Working Group felt that the key regulatory materials to review were the Australian (ASIC) Report on Consumer Credit Insurance; the FCAC's Domestic Bank Retail Sales Practices Report; CCIR/CISRO's "Guidance: Conduct of Insurance Business and Fair Treatment of Customers"; and the AMF's Sound Commercial Practices Guideline. The key regulatory expectations from these documents were summarized in a "thought starter" document developed by CAFII management, and the Working Group has been considering each regulatory expectation one-by-one in the weekly meetings.

Working Group members have agreed that producing a principles-based product(s) is the desired outcome, rather than a more concrete, specific (and potentially more prescriptive) document(s). However, there is a recognition among participants in the Working Group that if the output of this effort is too high-level and theoretical, it is less likely to make a positive impression on regulators.

Stikeman Elliot's competition law expert Mike Kilby was asked to speak to the group about the Competition Act and what was permissible, and what was not, in the group's deliberations.

Mr. Kilby noted that members of the Working Group should avoid explicit discussion of pricing strategies, and any discussions of matters such as loss ratios should be at a high-level, and only at an industry-wide, as opposed to company-specific, level. There needs to be a balance between developing best practices in the interests of the consumer, while not straying into discussions on pricing or product design. As such, standardization is not a permissible activity, but best practices that members seek to adhere to is a permissible activity. The approach, Mr. Kilby concluded, should be focused on "guardrails" around issues like appropriate levels of disclosure, that individual members would then separately implement.

The Working Group received a Stikeman Elliott document on CAFII's Competition Law Policy and some comments and feedback on it; a commentary from Stikeman Elliott on the protection of solicitor-client privilege; and a copy of CAFII's Competition Law Policy. Members were asked to review and adhere to the recommendations and parameters set out in these documents.

Progress and Next Steps

The Working Group has had seven weekly meetings to date – three in-person and four teleconference meetings – and has now finished its work on reviewing the regulatory expectations and identifying high-level/possible response initiatives.

Those possible response initiatives will now be bundled into thematically-related issues, and smaller volunteer teams of Working Group members will work on them to identify and flesh out more specific possible industry actions. The development of possible industry commitments/principles around those broad regulatory expectation themes will now be the focus of future Working Group meetings.

The Working Group's expectation is that we will have an Interim Report, with some specific proposals for Board feedback, ready for the Board's next meeting on December 3/19, followed by the Group's final recommendations and output in the March/April 2020 timeframe.

Agenda Item 4(g)
October 29/19 EOC Meeting

**CAFII Opportunity To Take Over CBA's Quarterly CGI Benchmarking Study:
RFP To Actuarial Firms On An Enhanced Benchmarking Study**

From: Keith Martin <Keith.Martin@cafii.com>

Sent: October-16-19 10:41 AM

To: CAFII Board Members and Surrogates

Subject: Follow up on CAFII Taking Over CBA Benchmarking Study on Credit Protection Insurance

Dear Member of the CAFII Board (and Surrogates),

We have been advised that during the 1 October, 2019 Board meeting's *in camera* session, it was agreed that our Association should only proceed with an RFP on CAFII taking over the CBA's Creditor's Group Insurance (CGI) Benchmarking Study if we include a number of consumer-oriented data points, which would also be part of the study alongside sales and penetration measures. This would ensure that the study aligns with members' focus on consumer outcomes and the fair treatment of customers.

It was suggested that the EOC strike a working group to identify such consumer-oriented data points.

However, in their responses to the benchmarking RFP originally produced for the contemplated CCBPI Special Project, the actuarial firms asked to bid identified a number of useful data points, including some consumer-oriented ones, in addition to the ones set out in the RFP. As a result, we believe that the actuarial firms participating in the RFP may represent a good alternative to a potential EOC working group for the identification of consumer-oriented metrics.

In a follow-up conversation last week between EOC Chair/Board Secretary Martin Boyle, and CAFII Management Brendan Wycks and Keith Martin, it was determined that we could modify the draft RFP for the CBA/CAFII CGI Benchmarking Study to factor in the requirement to have consumer-oriented data points included in it. The bidding firms (RSM Canada; Towers Watson) would be asked to identify such consumer data points as part of their RFP response.

More specifically, we would point out some consumer-oriented data points in the RFP such as consumer complaints, and claims payouts (claims % paid out, not loss ratio)—as examples, and ask the bidding actuarial firms to identify additional such measures for CAFII's consideration.

Please indicate by noon on Friday, 18 October, 2019 whether you are comfortable with CAFII's proceeding with a modified/updated RFP on this basis, rather than striking an EOC Working Group tasked with identifying consumer-oriented metrics.

Thank you,

Keith Martin

Co-Executive Director / Co-Directeur général

Canadian Association of Financial Institutions in Insurance



August 30, 2019

Mr. Brendan Wycks
Executive Director
Canadian Association of Financial Institutions in Insurance (CAFII)
21 St. Clair Ave. West, Suite 802
Toronto ON M4T 1L9

Brendan.wycks@cafii.com

Dear Mr. Wycks:

Re: 2019 CCIR Stakeholder Dialogue

The Canadian Council of Insurance Regulators (CCIR) is inviting your organization to participate in the 2019 CCIR Stakeholder Dialogue ("Dialogue") in Toronto, Ontario on Tuesday, November 5, 2019.

This year's CCIR Stakeholder Dialogue will focus exclusively on the next strategic plan. As you are aware, the current strategic plan (2017-2020) will end on March 31, 2020. CCIR is currently in the process of establishing its next strategic plan (2020-23) and is inviting key stakeholders to provide their insights on emerging issues, industry trends and specific feedback on proposed priorities and strategic initiatives. A confidential consultation draft will be provided in advance of the meeting.

Stakeholders participating in-person will be provided 40 minutes to meet with CCIR Members. Stakeholders that are unable to attend in-person may make written submissions.

Materials prepared by your organization for the meeting should be provided in advance, along with any specific questions you may wish to discuss with CCIR Members.

We ask that you please RSVP by September 30, 2019 by contacting Tony Toy, Policy Manager at Tony.Toy@fsrao.ca or by phone at 416-590-7257, to confirm your organization's participation. Additional meeting details, including venue, will be provided to confirmed attendees.

We greatly appreciate your organization's contribution and look forward to meeting with you.

Sincerely yours,

Original signed by

Patrick Déry, Chair
Canadian Council of Insurance Regulators



DRAFT Strategic Plan 2020-23

Overview

In the spring of 1914, insurance superintendents from the four western provinces met in Calgary, “to discuss ways and means to secure uniformity in the laws relating to contracts of insurance.” The meeting led to the formation of the Association of Western Superintendents of Insurance, which, by 1917, developed into the Association of Provincial Superintendents of Insurance of the Dominion of Canada.

Over the following decades, the association expanded to include all of the provinces and territories and the federal Office of the Superintendent of Financial Institutions. In 1989, it took on its current name: the Canadian Council of Insurance Regulators (CCIR).

For over 100 years, CCIR has adapted to changes in the regulatory landscape. Throughout its history, it has been at the forefront of promoting consistent regulatory approaches across jurisdictions and leading the way for reforms to protect consumers and to maintain confidence in the insurance sector. Building upon its strong foundation, the CCIR remains committed to working with industry to meet the challenges and seize opportunities presented by a rapidly changing marketplace.

Message from the Chair

To be approved by the CCIR Chair.

DRAFT

Mandate

The CCIR is a forum for Canadian insurance regulators to collaborate in order to enhance insurance supervision and regulation, serve the public interest and foster increased cooperative supervision and information sharing among regulatory authorities with the objective of strengthening oversight of the Canadian insurance industry.

Vision

Effective regulation supports consumer protection, enhances confidence and stability while anticipating transformation in the Canadian insurance marketplace.

Mission

We work collaboratively to find solutions to common regulatory issues, increase cooperative supervision, consider international standards and promote harmonization in conjunction with financial services regulators, policy makers and stakeholders.

Values

Organizations are driven by the shared values of their members. We have a shared commitment to:

- Cooperation
- Accountability
- Leadership
- Responsiveness
- Respect
- Integrity
- Accessibility
- Creativity
- Innovation

Structure

The CCIR functions through a secretariat, standing committees and working groups, operating under the direction of the CCIR Executive Committee:

Chair

Mr. Patrick Déry

Superintendent of Solvency, Autorité des marchés financiers - Québec

Vice-Chairs

Mr. Robert Bradley

Superintendent of Insurance, Department of Justice and Public Safety - Prince Edward Island

Mr. Frank Chong

Superintendent, Financial Institutions (A), Financial Institutions Commission - British Columbia

Mr. Huston Loke

Executive Vice President, Market Conduct, Financial Services Regulatory Authority - Ontario

Mr. J. Scott Moore

Superintendent of Financial Institutions, Financial Institutions Regulation Branch - Manitoba

The CCIR Secretariat is responsible for coordinating, monitoring and reporting on all projects and policy initiatives as well as administering CCIR activities, including strategic planning and budgeting. It also provides project management support to strategic CCIR initiatives.

Approach

- We coordinate our regulatory activities and share information.
- We conduct ongoing market intelligence and research to stay informed and keep abreast of emerging consumer and market issues.
- We actively engage with our stakeholders to understand key issues facing the industry, as we develop and recommend policies to our members.

Strategic Themes

To enhance the regulatory framework and regulatory practices in Canada, CCIR intends to remain focused on the advancement of consumer protection and interests, enhancing collaboration and cooperation among regulators and fostering effective relationships with industry stakeholders. In setting our overall direction and strategic priorities for the next three years, CCIR considered the following key strategic themes in the insurance sector:

Technological Innovation

The pace of innovation continues to accelerate, and as new technologies are rapidly becoming mainstream, the need persists for adapting appropriate supervision of processes, products and insurers in an evolving marketplace that maintain financial stability, consumer protection and confidence. As insurance products and their delivery evolve in a digital world, and consumers putting pressure on industry to deliver innovation without compromising security and protection of privacy are risks supervisory authorities around the world are responding by trying to align cyber risk with broader risk management strategies. A recognition that the consumer demographic consists of those that are tech savvy along with those that prefer to interact with insurers more traditionally should be maintained. Advancements in other markets, such as the automobile industry in the development of autonomous vehicles, may alter that traditional insurance product.

Climate Change and Natural Catastrophes

The large-scale and long-term nature of this issue poses significant financial challenges as well as opportunities. Federal, provincial and territorial governments have made progress in implementing the the 'Pan-Canadian Framework on Clean Growth and Climate Change'. Insurers, investment managers and asset owners have an important role to play in providing better climate-related financial disclosures.

Conduct and Culture

As the financial landscape is changing, so is the industry's engagement model with the consumer as well as the regulator. Both industry and regulators are taking a new look at risk and compliance activities. While industry is looking for practical supervisory initiatives through reduced regulatory burden, regulators have to balance this with both prudential and market conduct frameworks that do not weaken regulatory effectiveness.

Strategic Priorities

CCIR is committed to three strategic priorities, each of which is focused on consumers, regulators, and industry:

- Build upon cooperative supervision in aligning with best international practices to enhance consumer protection.
- Work collaboratively with regulatory partners to grow and leverage national regulatory capacity.
- Partner with industry stakeholders to identify opportunities to increase regulatory and supervisory harmonization where practicable and appropriate.

In order to pursue our strategic priorities, we will work with stakeholders on new and continuing initiatives over the next three years:

#	Strategic Priority	Initiatives
1.	Build upon cooperative supervision in aligning with best international practices to enhance consumer protection	1.1 Fair Treatment of Customers 1.1.1 Measure the fair treatment of customers through the principles outlined in the <i>Conduct of Insurance Business and Fair Treatment of Customers</i> (FTC Guidance). 1.1.2 Continue monitoring of regulatory developments, internationally and in other financial services sectors, and evaluating their impact on and appropriateness for the insurance regulatory framework and industry implementation of the guidance principles.

#	Strategic Priority	Initiatives
		<p>1.1.3 Research current industry incentive programs and their alignment with the FTC Guidance and assess whether other specific guidance(s) are required.</p> <p>1.2 Segregated Funds</p> <p>1.2.1 Facilitate a harmonized implementation of the Position Paper recommendations, address challenges with “legacy” systems, and follow up on alignment of requirements with mutual funds.</p> <p>1.3 Consumer Awareness and Understanding of Risks and Coverages Related to Natural Catastrophes</p> <p>1.3.1 Assess consumer awareness and increase consumer understanding of the risks related to natural catastrophes, preparedness and opportunities to mitigate these risks, insurance options and coverages as well as the features of disaster relief programs.</p>
2.	<p>Work collaboratively with regulatory partners to grow and leverage national regulatory capacity</p>	<p>2.1 Cooperative Approach to Financial Services and Insurance Technology</p> <p>2.1.1 Work with regulatory authorities across sectors to develop a framework for coordinated research, information sharing and the regulation of emerging technologies.</p> <p>2.1.2 Develop an electronic commerce framework to share information, coordinate research, propose approaches to the regulation of emerging technologies and security of private information in a digital environment.</p>

#	Strategic Priority	Initiatives
		Continue to implement electronic proof of automobile insurance nationally.
3.	Partner with industry stakeholders to identify opportunities to increase regulatory and supervisory harmonization where practicable and appropriate	3.1 Harmonization Opportunities 3.1.1 Work with industry stakeholders to identify specific differences of importance within the regulatory framework and work toward greater consistency in approach and/or harmonization across jurisdictions. 3.1.2 Partner with industry to develop, finalize and monitor progress when implementing of initiatives such as the fair treatment of customers guidance, annual statement on market conduct, Fintech and travel insurance.

Standing Committees

In addition to the above initiatives, CCIR will continue to partner with various stakeholders, through the work of the following Committees:

- **Cooperative Supervision Oversight Committee (CSOC)**

The CSOC ensures CCIR the effective operations, maintenance and stewardship of the core elements of the cooperative supervisory framework guided by the Insurance Core Principles (ICPs) as developed by the International Association of Insurance Supervisors (IAIS). The CSOC is responsible for overseeing the operations of the Annual Statement on Market Conduct and maintaining the Memorandum of Understanding agreement among CCIR members. The committee also leads activities under the Cooperative Supervision component where emerging issues are examined on a thematic and or insurer basis.

- **OmbudServices Oversight Standing Committee (OOSC)**

Through the OOSC, CCIR provides regulatory oversight for third party dispute resolution systems in the insurance sector, including the General Insurance OmbudService (GIO) and the OmbudService for Life and Health Insurance (OLHI). The ombudservices fulfill the public interest objectives of complaint resolution, serving as an important component of a well-functioning consumer protection policy framework.

- **Assuris/Property and Casualty Insurance Compensation Corporation (PACICC) Committee**

Through the Assuris/PACICC Committee, CCIR will be taking a more proactive approach by participating in industry policy initiatives at an early stage in order to better understand the rationale

and intended outcomes. The Committee continues to review and analyze proposed bylaw changes of the compensation corporations for life and general insurers and provide recommendations to its members for each jurisdiction to make appropriate decisions. Assuris and PACICC are industry non-profit organizations that protect Canadian insurance policyholders in the event that an insurer should fail, serving as another important component of the consumer protection framework.

- **Facility Association Standing Committee**

Our Facility Association Standing Committee has been established to streamline the communications between regulators and the Facility Association, the provider of automobile insurance to drivers who are unable to obtain automobile insurance through the voluntary insurance market.

- **Forms Committee**

The Forms Committee, ensures the supervisory return forms and instructions for both P&C and Life required from every insurer registered in Canada.

- **Capital Requirements Information Committee**

The Capital Requirements Information Committee ensures the sharing of information regarding changes to the regulatory capital requirements.

CCIR Secretariat

- **Powers of Attorney and Undertakings (PAUs) Repository**

The CCIR Secretariat maintains and provides access to the repository of PAUs filed by insurance companies all over North America. This function means that insurers filing PAUs with respect to private automobile insurance do not have to file that document in each province or territory the policyholder might visit.

Members of the Canadian Council of Insurance Regulators



Financial
Institutions
Commission



FINANCIAL AND
CONSUMER SERVICES
COMMISSION



FSRA

Financial Services Regulatory
Authority of Ontario



OSFI
BSIF



AUTORITÉ
DES MARCHÉS
FINANCIERS



Financial and
Consumer
Affairs Authority



Agenda item 4(i)

October 29 EOC Meeting

From: Rachel Olaso-Pezeshkian <Rachel.Olaso-Pezeshkian@fsrao.ca>

Date: September 24, 2019 at 6:05:58 PM EDT

To: "'keith.martin@cafii.com'" <keith.martin@cafii.com>

Cc: Huston Loke <Huston.Loke@fsrao.ca>, Swati Agrawal <Swati.Agrawal@fsrao.ca>

Subject: Join the next phase of FSRA's stakeholder engagement (CAFII)

Good afternoon. Please find attached email from Mr. Loke, EVP Market Conduct, FSRA.

Dear Mr. Martin,

As a member of our Industry Advisory Groups (IAGs), you have played an important role in the launch of the Financial Services Regulatory Authority of Ontario (FSRA). We are grateful for your valuable contribution to this process, and invite you to continue being part of the new phase of our stakeholder engagement process.

Building on the success of the IAGs in guiding our launch, we are issuing open calls for membership in FSRA's new Stakeholder Advisory Committees (SACs).

The SACs will also build upon input from our May 2019 stakeholder survey. Our stakeholders highlighted the importance of having consultations throughout the year and recommended that these consultation be separated by sector. Our stakeholders also noted the importance of FSRA reporting on the outcomes of committee sessions and on how feedback was considered.

The SACs will become the primary sectoral consultation bodies for FSRA's Board of Directors going forward. They will assist the Board in its duties by providing information, insights and expertise related to our regulatory priorities, budget and rule-making. They will help to fulfill our commitment to an open, transparent and collaborative approach that involves stakeholders and consumers, and ensures broad input and perspectives as we work to deliver our mandate under the [Financial Services Regulatory Authority of Ontario Act, 2016](#).

Applications will open on **September 25, 2019**, and the deadline for submissions is **October 23, 2019**. We encourage you to learn more at <https://www.fsrao.ca/engagement-and-consultations#sacs>. For more information, please contact

Margaret Kingerski, Assistant Corporate Secretary, Legal and Enforcement

Email: Margaret.Kingerski@fsrao.ca

Tel: 416-590-2008

Yours truly,

Huston Loke
Executive Vice President, Market Conduct
Financial Services Regulatory Authority of Ontario

From: Rachel Olaso-Pezeshkian <Rachel.Olaso-Pezeshkian@fsrao.ca>
Sent: September-24-19 6:01 PM
To: Brendan Wycks <brendan.wycks@cafii.com>
Cc: Huston Loke <Huston.Loke@fsrao.ca>; Swati Agrawal <Swati.Agrawal@fsrao.ca>
Subject: Join the next phase of FSRA's stakeholder engagement (CAFII)

Good afternoon. Please find attached email from Mr. Loke, EVP Market Conduct, FSRA.

Dear Mr. Wycks,

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Tel: 416-590-2008

Yours truly,

Huston Loke
Executive Vice President, Market Conduct
Financial Services Regulatory Authority of Ontario

Ottawa Memorandum

To: Keith Martin, Brendan Wycks
From: David Elder / (613) 566-0532
Re: Summary of lobbyist registration requirements
Date: September 23, 2019

You had asked us to prepare a memo summarizing the general framework for lobbyist registration in Canada, including key definitions, thresholds for registration and ongoing reporting requirements, as well as opining on the implications of a recent decision of the Québec Court of Appeal with respect to the interpretation of the lobbyist registration statute for that province.

While some municipalities in Canada also have lobbyist registration by-laws, we have focused our summary only on federal and provincial lobbyist registration requirements, as we understand that only these are likely to be relevant to CAFII.

We have also focused only on the registration/reporting requirements of Canada's lobbyist registration laws, not restrictions or prohibitions on lobbying by former public office holders, or prohibitions on activities that would put elected officials or government employees in a conflict of interest. While some of these latter restrictions/prohibitions are contained in lobbyist registration law, others are covered by a separate lobbyist code of conduct, and many are covered by separate conflict of interest, integrity or public sector accountability legislation.

Overview

There are lobbyist registration laws in each of the provinces, as well as a federal law. By and large, these laws are intended to ensure the transparency of lobbying activities, by creating public registries that allow the public, the media and public office holders to know who is lobbying the government, for what purpose, and, for consultant lobbyists, in whose interests. A number of the laws explicitly recognize lobbying as a legitimate activity.

The following are the lobbyist registration laws in effect in the provinces and federally:

Federal - *Lobbying Act*, R.S.C., 1985, c. 44 (4th Supp.)

Alberta – *Lobbyists Act*, S.A., 2007, c. L-20.5.

British Columbia – *Lobbyists Registration Act*, SBC 2001, c. 42.

Manitoba – *The Lobbyists Registration Act*, C.C.S.M. c. L178

New Brunswick – *Lobbyists' Registration Act*, RSNB 2014, c. 11.

Newfoundland & Labrador – *Lobbyist Registration Act*, SNL 2004, c. L-24.1.

Nova Scotia – *Lobbyists' Registration Act*, SNS 2001, c. 34.

Ontario - *Lobbyists Registration Act*, 1998, S.O. 1998, c. 27, Sched

PEI – *Lobbyists Registration Act*, RSPEI, c. L-16.01.

Québec – *Lobbying Transparency and Ethics Act*, RSQ, c. T-11.011

Saskatchewan – *The Lobbyists Act*, SS 2014, c. L-27.01.

Happily, while there are some differences between these laws, including differences in terminology and additional activities defined to be lobbying, the lobbyist registration regimes across Canada are substantially similar in terms of how they classify lobbyists, and the activities that trigger registration (and reporting, in the case of the federal law).

These laws have separate categories for “consultant lobbyists” (i.e. paid external lobbying consultants) and “in-house” lobbyists. Some of the laws have separate classes of “in-house lobbyists” for non-profit and for-profit organizations, but the differences relate only to the mechanics of reporting. While a core set of activities require registration by both consultant and in-house lobbyists, in most jurisdictions, some activities trigger registration requirements for consultant lobbyists only. CAFII would fall under the “non-profit” category of in-house lobbyist, in jurisdictions where non-profits are recognized separately, and the general in-house lobbyist category elsewhere. To the extent that CAFII retains consultant lobbyists, note that consultant lobbyists are legally responsible for their own registration and reporting, regardless of the identity of the client on whose behalf they are acting. The client has no legal obligation with respect to the reporting obligations of a consultant lobbyist it has retained, although would likely want to ensure itself that the.

To aid in the comparison of these various law, we have attached a matrix comparing each jurisdiction with respect to:

- The activities that trigger registration
- The activities that explicitly do not trigger registration
- The threshold time requirements that apply to registration
- Ongoing reporting or registration renewal requirements
- Registration process basics: who must register and when

Note that both this memo and the attached matrix are summaries only. While there is considerable conceptual similarity between the various legislative regimes, the actual wording of the statutes differs somewhat. In all cases, reference should be had to the relevant statute and related regulations/guidance for the precise requirements for each jurisdiction.

Lobbying

Under each of the laws, registration requirements are triggered by certain defined activities undertaken with respect to public office holders. All but the federal law defines these activities as being “lobbying”. The federal does not include a definition of “lobbying” *per se*, but rather, provides that registration is required with respect to certain types of communications (“designated communications”) with public office holders. Although not formally defined as “lobbying” under the federal law, it essentially amounts to the same thing. In this memo the term “lobbying” will be used to refer to the activities in all covered jurisdictions that trigger a registration requirement.

a. Public office holders

All of the lobbyist registration laws define lobbying by reference to specified types of communications to public office holders. Although there are some differences in specificity between these various laws, the term “public office holder” is generally defined to include what one would expect: elected officials, ministerial staff, government appointees and employees of the relevant government or its agencies. Some explicitly exclude judges; others exclude officers, directors and employees of designated crown corporations; however, we are not aware of any such exclusions that are likely to be relevant to CAFII.

In addition to defining what is a public office holder, the federal law also uniquely defines the term “designated public office holder” which is a subset of public office holders that includes only Ministers and their office staff and senior civil servants at the DM, ADM and CEO level or equivalent.¹ Under the federal regime only, following lobbyist registration, communications to designated public office holders (but not other public office holders) are reportable on a monthly basis.

b. Legislation and policy-making

As noted, each of the jurisdictions shares a core set of activities that are considered to be lobbying, each of which involves communication intended to influence the legislative or policy-making process. These apply in all jurisdictions, for both in-house and consultant lobbyists. These may be summarized as communications made to public office holders in the relevant government with respect to:

- The development of any legislative proposal by the government, an elected member or, federally, a Senator
- The introduction, passage, defeat or amendment of any Bill or resolution in a legislative assembly (including the Senate, federally)
- The making or amendment of any regulation
- The development or amendment of any government policy or program

A majority of the jurisdictions add to this core list any communications that seek to influence a government decision to privatize any government institution, including a crown corporation, that provides services to the public,² although arguably, even without such an explicit provision, such activity would likely also be caught by communications made with respect to a change to legislation or government policy.

c. Contracts, permits, appointments and meetings

In addition to the foregoing core lobbying activity, to varying degrees, the covered jurisdictions also require registration respecting communications directed at the awarding of contracts, issuing of government authorizations or appointment of public officials. They also require registration for arranging a meeting between a public officer holder and any other person.

All the covered jurisdictions treat communication respecting the awarding of government contract, or the terms of tender prior to the awarding of a contract, as “lobbying” although a slight majority of the jurisdictions include this as a registration trigger for consultant lobbyists only.

¹ As well as other individuals designated by regulation.

² Only the federal law and the laws of Manitoba and Québec do not treat this activity as “lobbying”. Of the remaining provinces, all except Ontario include decisions to both transfer assets and to outsource government functions to the private sector; Ontario’s law covers only transfers of government assets to the private sector.

All the jurisdictions also include as reportable activity communications with public office holders the arrangement of a meeting between a public office holder and any other person, although in only four provinces (Newfoundland & Labrador, PEI, Québec and Saskatchewan) is this activity reportable for in-house lobbyists.

Only Newfoundland and Québec include communications respecting the appointment of a public official as reportable activity. Only Québec includes communications respecting the issuance of any permit, licence, certificate or other organization.

d. Exclusions

For greater certainty, the lobbyist registration laws, to varying degrees, also explicitly exclude certain common interactions with government stakeholders (to the extent that they might be otherwise reportable³). Even where not explicitly excluded by statute, the body responsible for interpreting and enforcing the lobbyist registration requirement has issued guidance to a similar effect. Many of these relate to requests for information or submissions in public proceedings.

All jurisdictions exclude, either by statute, regulator guidance, or necessary implication, the following from requiring registration:

- the making of written or oral submissions to committees of a legislative body, or other persons or bodies where proceedings are a matter of public record.
- Communications with respect to enforcement, interpretation or application of any federal law or regulation
- Submissions to a public office holder concerning the implementation or administration of any policy, program directive, etc.
- Communications that are restricted to a request for information from the government
- Submissions in direct response to a public officer holder's request for comments
- Submissions made to an elected official by a constituent, with respect to a personal matter (in some cases, not excluded if the submission relates to a private bill for the benefit of that constituent)
- Making submissions in judicial or adjudicative proceedings, or in other public proceedings
- Making submissions in the negotiation of a contract, including a collective agreement

Registration threshold

a. General

While all lobbying activities by consultant lobbyists require registration, all the covered jurisdictions require registration by in-house lobbyists only when a certain threshold of materiality has been met or exceeded (or is anticipated to be met or exceeded). Lobbying activity falling below the established threshold does not require registration. As can be seen in the attached chart, these thresholds vary from

³ Indeed, on a proper interpretation of the activities that are designed to constitute "lobbying", many of these activities would not be reportable anyway,

jurisdiction to jurisdiction, but would generally cover organizations that would do little in-house lobbying in the jurisdiction in question.

Some statutes include an explicit time-based registration threshold. Other laws just make in-house lobbyist registration requirements subject to a general “significant part of the duties” threshold, although, when this is the case, regulators have issued guidance that indicates what time-based threshold would constitute a “significant part of the duties” of in-house lobbyists (although, see below re Québec). For the most part, time-based thresholds are calculated either with respect to an actual individual employee or on the basis of a “virtual person”. For example, in the case of the federal law, where the Commissioner of Lobbying considers registration to be required when lobbying activity exceeds 20% of a person’s time, this threshold is met when the time spent by all employees of an organization cumulatively exceed one day per week of what would be a single person’s time, if a single person carried out all the lobbying activities in question. This obviously avoids having organizations avoid registration by dividing up lobbying activity amongst its employees.

Note that the various jurisdictions calculate their time-based thresholds over different periods of time. For example, under the federal law, the threshold for in-house registration is 20% of one person’s time, calculated monthly; whereas in BC it is 100 hours per year, and in PEI, it is 50 hours over a three-month period.

It is also important to note that what types of activity is to be counted toward the time threshold as “preparation”. For example, only Saskatchewan and the federal government require travel time to be included. Ontario explicitly excludes preparation time from the calculation of the time-based threshold. The Atlantic provinces don’t offer any guidance at all as to whether preparation should be included (which suggests that it should not be included as, strictly speaking, preparation time would not fit within the definition of “lobbying” for most regimes).

b. Developments in Québec re registration threshold

Like several other Canadian jurisdictions, the statutory threshold for registration by in-house lobbyists⁴ under Québec’s law is where lobbying constitutes a significant part of the duties of an employee. In 2005, the Commissioner of Lobbying had issued guidance indicating that a time-based threshold of 12 days per year of time spent lobbying would constitute a “significant part of the duties” and would therefore trigger the registration requirement.⁵

However, in April 2017, the Québec Court of Appeal ruled in the case of *Cliche c. Directrice des poursuites criminelles et pénales*, 2017 QCCA 668, that a time-based threshold alone cannot be used to determine the threshold for registration by in-house lobbyists; rather, all relevant factors must be considered, including the job functions of employees engaged in lobbying, in determining what would constitute a significant part of duties.

In guidance issued following the decision⁶, the Commissioner of Lobbying now does not slavishly apply any quantitative criteria in assessing the requirement to register (although will still consider such indicia), but will instead focus on an analysis of more qualitative criteria, such as the regularity and intensity of a person’s lobbying activities. The new approach mentions a number of potentially relevant factors such as formal designation by title of having lobbying responsibilities, nature of the tasks undertaken by an individual and the extent of their involvement in a project, etc. Accordingly, unlike the case of the other

⁴ In fact, the Québec law classifies in-house lobbyists as either “enterprise lobbyists” (for profit organizations) or “organization lobbyists” (not for profit organizations).

⁵ Notice n° 2005-07 of the Commissioner of Lobbying concerning the interpretation of the expression “a significant part”

⁶ https://www.commissairelobby.qc.ca/fileadmin/user_upload/Ruling_Court-Of-Appeal-Of-QuebecNotice2005-07.pdf

provinces, a determination by CAFII of the requirement to register will have to take into account a broad variety of potentially relevant circumstances, beyond the amount of time spent lobbying. For example, to the extent that the Co- Executive Directors are tasked, as a key part of their duties, to engage in lobbying activities with government stakeholders, this would tend to suggest registration is more likely to be seen to be required. Given the vagueness of the current approach to the test, we would recommend consulting with the Commissioner in Québec in any cases where the obligation to register may not be clear.

Registration

With the exception of PEI⁷, for in-house registration, all Canadian jurisdictions provide that it is the most senior paid officer of a corporation/organization that is responsible for completing and filing the registration on behalf of the organization. In CAFII's case, we understand that this would be either of the Co-Executive Directors.

Thresholds vary somewhat in terms of deadlines for registration, although for in-house registrations, most regimes require registration with 2 months/60 days of undertaking lobbying activity (i.e. getting instructions/deciding to do so). However, Newfoundland allows only 10 days for such registrations to be made. Québec ties its registration deadline to the date on which lobbying activity was actually commenced, not just undertaken.

The process for registration varies from jurisdiction to jurisdiction, but most registrations are done on line, requiring first that an account be set up with the designated registration body. Once set up, registrants must complete online forms that require varying levels of information and detail. Generally, the registration must include the names of all senior paid officers of the organization who perform lobbying activities, as well as the names of any employees who individually would exceed the registration threshold for that jurisdiction. The return must also include the names of all departments lobbied and a general description of the subject matter of the lobbying activity. The drafting of the latter is considered to be somewhat of an art for some, with the objective of meeting registration requirements while not giving away too much detail to competitors or other stakeholders that may review the registration once made. In some regimes, like the federal one, registration may be subject to a vetting process, to ensure adequacy of the disclosures made in the registration forms.

Reporting/Updating

After registration all regimes require that in-house registrants notify the applicable registrar within a fixed period (generally 30 days) of any changes in the registration, such as the ceasing of lobbying activity by the organization or by one or more employees. Organizations must also renew (or withdraw) registrations at least every 6 months, to ensure some currency of the public register.

In the case of the federal regime only, monthly communications reports must also be filed (within 15 days of the end of the month) with respect to any prescribed communications between a registered lobbyist and a designated public office holder (as described above, the senior most officials in government).

Accordingly, under the federal law, while initial registration is required with respect to lobbying communications directed to public office holders generally (subject to the 20% rule); monthly reporting is required only for lobbying communications with more senior public office holders, but without any reference to the 20% rule (i.e. even a single hour of communication with a Minister in a given month would be reportable).

⁷ For for-profit organizations, PEI places registration responsibility on each individual registrant; however, also requires registration by the most senior paid officer in respect of non-profit organizations.

Lobbyist Registration in Canada												
		FED	BC	AB	SK	MB	ON	QC	NB	NS	PEI	NL
Activities which Require Registration												
Communicating with a Public Officer Holder in an attempt to influence:	The development of a legislative proposal	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	The introduction of a bill or resolution, or the passage, defeat or amendment of any bill	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	The making or amendment of a regulation	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	The development, amendment or termination of any government policy or program	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	The awarding of any grant contribution or other financial benefit by or on behalf of the government	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	A decision by the Executive to transfer from the government all or part of, or any interest in or asset of, any business enterprise or institution that provides goods or services to the government or the public	-	✓	✓	✓	-	✓	-	✓	✓	✓	✓
	A decision by the cabinet or a member to privatize the provision of any goods or services to the government	-	✓	✓	✓	-	-	-	✓	✓	✓	✓
	The awarding of any contract by or on behalf of the government, or the terms of a tender or RFP prior to the awarding of that tender or acceptance	✓ (Consultant only)	✓	✓ (Consultant only)	✓	✓ (Consultant only)	✓ (Consultant only)	✓	✓ (Consultant only)	✓ (Consultant only)	✓	✓
	The appointment of a public official	-	-	-	-	-	-	✓	-	-	-	✓
	The issuance of any permit, license, certificate or other authorization	-	-	-	-	-	-	✓	-	-	-	-
	Arranging a meeting between a public office holder and any other person	✓ (Consultant only)	✓ (Consultant only)	✓ (Consultant only)	✓	✓ (Consultant only)	✓ (Consultant only)	✓	✓ (Consultant only)	✓ (Consultant only)	✓	✓
Activities which Do Not Require Registration ¹												
	Making submissions to committees of Parliament, the Legislative Assembly, or a body or person having jurisdiction or powers conferred by or under an Act in proceedings that are a matter of public record	●	●	●	●	●	●	●	●	●	●	●
	Communications that are restricted to requests for information	●	-	-	-	-	●	-	-	-	-	-
	Making submissions in direct response to a public office holder's request for comments	-	●	-	●	●	-	●	●	●	●	●
	Making submissions to your Member of Parliament, the Legislative Assembly, or a comparable municipal body unless the submission concerns private bills benefitting the constituent	-	●	●	●	●	●	-	●	●	●	●
	Making submissions prior to judicial or adjudicative proceedings, or in public proceedings	-	-	-	-	-	-	●	-	-	-	-
	Making submissions in the negotiation of an individual or collective labour contract	-	-	-	-	●	-	●	●	●	●	●

¹ Entries marked with a ● denote activities which are excluded expressly by statute, while entries marked with – denote activities which are excluded either by guidance documents or by implication.

Lobbyist Registration in Canada												
		FED	BC	AB	SK	MB	ON	QC	NB	NS	PEI	NL
	Communications concerning the enforcement, interpretation, or the application of any Act or regulation	●	●	●	●	●	●	-	●	●	●	●
	Making submissions to a public office holder concerning the implementation or administration of any program, policy, directive or guideline by the public office holder with respect to the person or organization	-	●	●	●	●	●	?	●	●	●	●
Threshold Requirements for In-house Lobbyists												
	Hours ²	20% of the working hours of one employee	100 per year	50 per year	100 per year	100 per year	50 per year	“Significant part of [the individual's] job” ³	20% of one employee's time over a 3-month period	20% of one employee's time over a 3-month period	50 hours in a 3-month period	20% of one employee's time over a 3-month period
	Whose activities count?											
	• Employees	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	• Officers	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	• Directors (employee/paid)	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	• Directors (non-employee/unpaid) ⁴	-	-	-	-	-	-	-	-	-	-	-
	Which activities count											
	• Preparation ⁵	✓	✓	✓	✓	✓	-	Likely	? ⁶	?	?	?
	• Communication	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Ongoing Reporting Requirements												
	Type of activity required to be reported	Communication with a DPOH ⁷	-	-	-	-	-	-	-	-	-	-
	Frequency											
	• Consultant Lobbyists	Monthly – within 15 days after end of month	-	-	-	-	-	-	-	-	-	-
	• In-house Lobbyists	Monthly – within 15 days after end of month	-	-	-	-	-	-	-	-	-	-
Renewal Requirements												
	Consultant Lobbyists	None – must inform OCL when lobbying	None – a new return must be	None – a new return must be	Every 6 months, within	None – a new return must be	Annual renewal	30 days after the anniversary of	Every 6 months, within	Every 6 months, within	Every 6 months, within	Every 6 months, within

² Note that collective activities of all employees of a corporation or organization count towards the time, despite some jurisdictions wording the threshold in terms of the time of one employee.

³ Quebec used to use 20% of one employee's time, however a recent court decision has held that this is now a case-specific determination.

⁴ Advisory Opinions and Guidance Documents from the Federal government, British Columbia, Alberta, and Ontario all suggest that if a Director is not an employee of a company/organization and does not receive remuneration beyond reasonable reimbursement of expenses then they do not need to register as a lobbyist. However, if a Director is compensated beyond reasonable reimbursement of expenses, the Federal Advisory Opinion and British Columbia's Advisory Bulletin say that that individual needs to register as a consultant lobbyist. While the other provinces do not have such explicit guidance, given that the definitions of “in-house lobbyist” and “consultant lobbyist” in every province includes language about compensation, it is likely that a similar approach would be taken in every province. There is no explicit guidance about Industry Associations – while registration may not be required for an unpaid director of an Industry Association, that individual may be required to register by virtue of their employment with regards to their employer (i.e. register as an in-house lobbyist for their employer).

⁵ Note that they type of activity that a regulator considers to be included in the calculation of the registration threshold varies widely. The statute, regulations and guidance for each jurisdiction should be reviewed to ensure proper calculation of this aspect of the threshold.

⁶ Entries marked with a question mark indicate that the relevant law, regulations and guidance either do not speak to the issue in question, or are not clear as to what is required.

⁷ Designated Public Office Holder – defined to be elected officials and most senior civil servants and appointees.

Lobbyist Registration in Canada												
		FED	BC	AB	SK	MB	ON	QC	NB	NS	PEI	NL
		undertaking has been performed or is terminated within 15 days after the end of the month	filed for each undertaking	filed for each undertaking	30 days	filed for each undertaking		initial registration	30 days	30 days	30 days	30 days
	In-house Lobbyists	None – must inform OCL when the organization of corporation no longer meets the threshold within 15 days after the end of the month	Every 6 months, within 30 days after	Every 6 months, within 30 days after	Every 6 months, within 30 days after	Every 6 months, within 2 months after	Every 6 months, within 30 days before or after	60 days after the end of the financial year of the enterprise or organization	Every 6 months, within 30 days after	Every 6 months, within 30 days after	Renewal every 6 months OR New registration for every new undertaking	Every 6 months, within 30 days after
Registration												
	Who is responsible for registration											
	<ul style="list-style-type: none">Consultant LobbyistsIn-house Lobbyists	The individual	The individual	The individual	The individual	The individual	The individual	The individual	The individual	The individual	The individual	The individual
		The most senior paid officer	The most senior paid officer	The most senior paid officer	The most senior paid officer	The most senior paid officer	The most senior paid officer	The most senior paid officer	The most senior paid officer	The most senior paid officer	For-profit – the individual Non-profit-senior officer	The most senior paid officer
	When must registration occur											
	<ul style="list-style-type: none">Consultant LobbyistsWithin X days of undertaking lobbying activity	10	10	10	10	10	10	30 ⁸	15	10	10	10
	<ul style="list-style-type: none">In-house LobbyistsWithin X of reaching the threshold	2 months	60 days	2 months	60 days	2 months	2 months	60 days	2 months	60 days ⁹	2 months	10 days

⁸ Note that in Quebec the time starts to run from when lobbying activity is commenced.

⁹ Note that in Nova Scotia the time starts to run from when it is determined that lobbying will take up a significant part of the duties of one employee.