



03 November 2020

Mark White  
CEO  
Financial Services Regulatory Authority  
5160 Yonge St 17th Floor  
North York, ON, M2N 6L9

**Re: FSRA Priorities and Budget 2021-2022**

Dear Mr. White,

On behalf of Intact, I am pleased to provide comments to the *FSRA Priorities and Budget 2021 – 2022* consultation.

Empower and protect P&C and auto insurance consumers

We support continued focus on protection of insurance consumers and believe that FSRA has done a good job facilitating our industry's consumer relief efforts during the pandemic.

Moving forward, we will continue to deliver consumer-focused innovation and FSRA should remain open to considering these opportunities on an ongoing basis. Any regulatory sandbox must be accessible to incumbent insurers and new market entrants. FSRA must also ensure financial fairness when new entrants wish to participate in Ontario's auto insurance market. This means a review of fees and assessments associated with innovation, as to make sure that incumbents are not unfairly subsidizing new entrants utilizing FSRA's resources.

Regarding the explicit inclusions of "P&C" in the revised FSRA priority, we would appreciate further clarification as to the intent of this revision from the year prior.

Support and implement government's auto insurance priorities

There is real opportunity in Ontario to deliver meaningful auto product reform that meets consumer expectation for affordability and fairness. While we recognize that government has much control over product reform policy, FSRA must act as key and active stakeholder in these reforms.

We were supportive of FSRA's approach to this priority for their fiscal year 2020-2021, we question why FSRA removed the term "transformative" auto insurance reforms, and we would encourage FSRA to continue to play an active role with the industry and government. We believe that, facilitated by the new data and analytics strategy, FSRA is best positioned to provide macro-level industry perspective to ongoing product reform discussions. Bold action to undertake 'transformative' reforms is necessary to achieve meaningful outcomes for consumers.



Implement auto insurance data and analytics strategy

We support FSRA undertaking review of the effectiveness of its data and analytics strategy, however, we want to make caution against any new approach that would create additional or duplicative reporting burden.

Its important that FSRA has the right tools to leverage collected data to support underwriting regulation transformation and auto insurance reform. It should also take advantage of this data and analytics capability to proactively provide advise to government on ongoing auto product policy reforms. Furthermore, with greater data collection comes greater expectation around data protection, which includes clear guidance and transparency around the use of industry data by authorized third parties.

As a member of the Stakeholder Advisory Committee, I look forward to our continued collaboration in helping build an auto insurance environment that delivers for Ontario's consumers and reduces unnecessary regulatory burden for business. Should FSRA require additional information, or clarification regarding the contents of this letter, Intact would be pleased to offer additional advice.

Thank you and regards,

A handwritten signature in black ink that reads "Julie Nolette". The signature is written in a cursive, flowing style.

Julie Nolette  
Vice President, Intact Insurance Personal Lines, Ontario and Atlantic