

October 29, 2021

Financial Services Regulatory Authority of Ontario
5160 Yonge Street, 16th Floor
Toronto, ON M2N 6L9

Dear Sirs/Mesdames,

The Canadian Association of Independent Life Brokerage Agencies (CAILBA) welcomes the opportunity to comment on the Financial Services Regulatory Authority of Ontario's (FSRA) Proposed 2022-2023 Statement of Priorities (the Proposed Priorities).

CAILBA is a national industry association of life insurance intermediaries that helps our members to stay abreast of change and effectively implement compliance and regulatory updates. For a summary of what CAILBA is and our industry involvement, [please click here](#).

Consumer Awareness

As FSRA sets out in pages 6-7 of the Proposed Priorities, "Risks for FSRA to monitor in this space include improper disclosure and lack of transparency; consumers not fully understanding their options; and product suitability." Along with our colleagues, we have identified this as a barrier to fair treatment of customers, both in the digital space and otherwise, although we agree with the points raised in the Proposed Priorities that digital innovation currently gives rise to potentially significant consumer misunderstandings/issues. In our view this may give rise to an opportunity for more, rather than less, supervision. We are fully supportive of enhanced innovation but recognize the importance of balancing this with fair treatment of customers.

Vulnerable and Disadvantaged Consumers

We applaud and concur with FSRA's Proposed Priorities' reference to and support of disadvantaged consumers. However, we would be interested in gaining a fuller understanding of what this means for the life and health insurance sector, particularly any intended guidance for advisors. We assume, based on the Proposed Priorities, that FSRA would continue to undertake thematic reviews as well as agent examinations. In our view, there are gaps that require continual monitoring for improvement and evidence-based reviews will indeed support FSRA's growth as an outcomes-focused and consumer-centered regulator, which will in turn support our members.

Modernizing Systems and Processes

We understand that this is an incremental journey. However, we agree that FSRA's priority of improved turnaround time for licensing, filing and registration processes would be a helpful initial step.

Modernizing Supervisory Approach

We have noted that FSRA's recent guidance reflects inter- and intra- national practices and support this continued tracking.

Life and Health Insurance Priorities

We fully support these priorities. In particular, we would welcome the publication of detailed cross-organizational reviews to identify areas for improvement.

Finally, we fully support FSRA's need for additional resources, and would appreciate the opportunity to join FSRA's proposed advisory panel to assist FSRA and the sector in their review of the issues outlined in the Proposed Priorities.

On behalf of our CAILBA members, we wish to thank you for the opportunity to comment.

Best regards,

Earleen Moulton
CAILBA Board, Regulatory Compliance

Eric Wachtel
CAILBA Board, Legislative Matters