

Financial Services Regulatory Authority  
25 Sheppard Avenue West, Suite 100  
Toronto, ON M2N 6S6

March 1, 2024

To the Reader(s),

**RE: CCUA Feedback on Proposed Approach to Strengthening Protection of Vulnerable Consumers**

The Canadian Credit Union Association (CCUA) appreciates the opportunity to provide feedback on FSRA's Proposed Approach to Strengthening Protection of Vulnerable Consumers. As the trade association for Ontario's credit unions and caisses populaires, we recognize the importance of fostering fair treatment and protection for all consumers, particularly those considered vulnerable.

We support the idea of ongoing measurement and evaluation in FSRA's approach to strengthening protection of vulnerable consumers. The CCUA is interested in understanding how FSRA intends to monitor trends and complaints along with the specific tools FSRA plans to use. Ensuring that sector data is properly utilized and benchmarked will help support FSRA's long term goals. If our research and insights team can support this work, we would be happy to connect, FSRA should also consider going out to credit unions early once a framework is understood to assess how best to capture data in this area that limits burden on credit unions and works within already established reporting mechanisms.

Currently credit union members are supported through the Ontario Market Conduct Code which outlines expectations for the sector around the treatment and fair sales practices towards consumers (vulnerable and non-vulnerable), while highlighting our cooperative model that focuses on relationship building and member success. Direct engagement with credit unions to work within already established conduct codes is desired by the sector and can provide valuable insights into the experiences and needs of credit union members who may be considered vulnerable, but FSRA should try to prevent any undue burden on credit unions in terms of reporting requirements. We suggest that any approach related to vulnerable consumers be done through our Market Conduct Code and not one-off guidance notes or requirements.

The proposed definition of vulnerable consumers appears broad and could encompass a wide range of individuals. It may be beneficial to provide additional clarity to avoid ambiguity and ensure effective implementation and data quality. This will ensure that the public has a clear understanding of what is required to meet the definition should future requirements exist around protecting vulnerable consumers. We would also note that the practice of pressuring consumers to invest in unsuitable products is a concern that extends beyond vulnerable consumers. Ensuring broad consumer protection measures is crucial, and policies should address suitability for all consumers. This can be addressed in the Market Conduct Code, and CCUA is currently working with the FSRA market conduct team to address these types of concerns.



Lastly, CCUA would like to express our interest in participating in the proposed cross-sector technical advisory committee, we believe collaborative efforts between FSRA and stakeholders, including credit unions, can enhance the effectiveness of the proposed approach. The CCUA looks forward to continued collaboration with FSRA to create a regulatory environment that protects the interests of vulnerable consumers while fostering a fair and efficient financial services sector.

Sincerely,

A handwritten signature in black ink, appearing to read "Brent Furtney", with a horizontal line drawn through it.

Brent Furtney  
Regional Director – Ontario Government Relations  
Canadian Credit Union Association

