



22 October 2020

Mr. Mark White  
CEO  
Financial Services Regulatory Agency of Ontario (FSRA)  
5160 Yonge St., Toronto, ON M2N 6L9

Via: <https://www.fsrao.ca/engagement-and-consultations/common-approach-treating-insurance-customers-fairly>

Dear Mr. White,

**Re: 2020-11 – A Common Approach to Treating Insurance Customers Fairly**

The Canadian Association of Direct Relationship Insurers (CADRI) is the voice of insurance enterprises that offer automobile, home and commercial insurance directly to Canadians. We advocate for flexible and evolving regulatory and legislative frameworks governing automobile, property and commercial insurance to enable product and service innovation so that Canadians can easily choose insurance that serves their needs through the delivery channels of their choice.

CADRI shares FSRA's interest in ensuring that people buying and benefiting from auto and home insurance in Ontario can expect, and will receive, fair treatment from insurers. CADRI members are very aware that treating consumers fairly is integral to corporate reputation, and have internal codes of conduct, policies, and procedures to ensure employees serve customers' needs.

CADRI applauds FSRA's proposal to adopt the Canadian Council of Insurance Regulators' (CCIR's) and Canadian Insurance Regulatory Organization's (CISRO's) *Guidance: Conduct of Insurance Business and Fair Treatment of Customers* (Guidance) to supervise the conduct of insurers with respect to fair treatment of consumers.

As direct-relationship insurers, CADRI members operate across Canada in many provincial and territorial jurisdictions. The Guidance provides the opportunity to align with one country-wide set of expectations and submit compliance information using CCIR's *Annual Statement of Market Conduct*. Our members did not believe the creation of individual and different sets of guidelines for each province and territory would be the most efficient or effective approach. Harmonization across Canada, in conformity with international standards, would ensure that the standards are universally understood and cost-effectively implemented.

We look forward to continuing the conversation with FSRA, and through CCIR and CISRO, as to how the Guidance is working and can be improved.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Alain Thibault', written in a cursive style.

Alain Thibault  
Chairman and CEO  
CADRI

cc:

CADRI Board of Directors  
CADRI Market Conduct Task Force  
CADRI Ontario Committee

Frank Chong, Chair, CCIR  
Ron Fullan, Chair, CISRO

Tim Bzowey, EVP, Auto/Insurance Products, FSRA  
Huston Loke, EVP, Licensing and Market Conduct, FSRA

Kim Donaldson, VP, Ontario Region, IBC  
Ryan Stein, Executive Director, Auto Insurance Policy and Innovation, IBC