



Independent Financial Brokers of Canada
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September 13, 2019

FIA & CUIA Review
Policy & Legislation Division
Ministry of Finance
PO Box 9470 Stn Prov Govt
Victoria BC V8W 9V8

Sent by email: fiareview@gov.bc.ca

Subject: Consultation Notice: Insurance Rebating

Independent Financial Brokers of Canada (IFB) appreciates the opportunity to comment on this Consultation Notice reviewing possible approaches to allowing rebating in the life and property and casualty insurance sectors.

IFB is a national, professional association representing approximately 3,500 licensed financial advisors. The majority of IFB members are mutual fund representatives and/or life insurance licensed, and many are licensed for other financial products, such as P&C insurance, securities, and mortgages, as well as offering complementary services to consumers such as estate and financial planning.

IFB supports its members, and the financial services industry more generally, by providing access to the professional tools advisors need. These include high quality in-person educational events at locations across Canada, a comprehensive professional liability insurance program for individuals and firms, a business continuity/succession planning program, compliance resources and regulatory updates. More recently, IFB launched IFB Academy which is an online education tool.

An important part of the work IFB does is to engage with government, regulatory bodies, industry stakeholders and others, to ensure access to independent financial advice remains a viable choice for consumers.

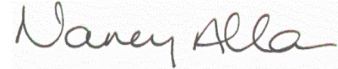
The topic of rebating has been raised several times in previous FIA and CUIA reviews. We wish to reiterate that IFB does not endorse rebating, regardless of the amount or percentage. The life insurance market is very competitive, and is no less so in the jurisdictions in Canada that prohibit rebating.

Competition in pricing should focus on the price charged to the consumer for the product being sold, and its affordability, rather than a 'hand-back' of a premium. Most provinces do not permit rebating, and IFB recommends that B.C. discontinue the practice, as it has no sound consumer value.

Thank you for the opportunity to comment.

Should you wish to discuss or have questions, please contact the undersigned, or Susan Allemang, Director, Policy & Regulatory Affairs, (email: sallemang@ifbc.ca).

Yours truly,

A handwritten signature in cursive script that reads "Nancy Allan". The signature is written in black ink on a light-colored background.

Nancy Allan
Executive Director
Email: allan@ifbc.ca