



The  
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March 24, 2006

CCIR Secretariat  
5160 Yonge Street  
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Attention: Carol Shevlin, Policy Manager (A)

Dear Ms. Shevlin:

Thank you for providing us with an opportunity to comment on the Consultation Paper entitled "Managing Conflicts of Interest: A Consultation Paper on Enhancing and Harmonizing Best Practices".

In general, we agree with the recommendations as set out in the paper with the following comments. At page 5, under the heading "Product Suitability", the paper states that the intermediary "must reasonably ensure that any product or service offered is suitable to fulfill those (clients) needs." Whereas we agree that the intermediary must always place the consumer's interests paramount, the standard set by the use of the word "ensure" may be inappropriate and unreasonable.

At page 6 of the paper, under the heading "Other matters raised in the 2005 consultation", the paper raises the matter of whether or not independence should be defined and whether performance-linked benefits and other financial links should be prohibited. It continues to state that the IPRC believes that the three recommendations set out in the paper *may* effectively address these matters for certain reasons, among them:

Actual or potential conflicts of interest  
from using the term "independent" are  
more effectively managed by disclosing  
the names of insurers the broker or agent

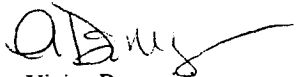
represents, any concentration of business with specific insurers, and any financial links with those insurers.

Actual or potential conflicts of interest from performance-linked benefits and financial links are more effectively managed by product suitability requirements, disclosure of concentration of business with specific insurers, and disclosure of compensation information.

In addition to the identification of any companies with which the intermediary has a relationship, and any performance-linked benefits and financial links, we submit that it is imperative that the actual ownership interest of any company or other entity in the brokerage or other intermediary be disclosed in order for any disclosure to be at all meaningful.

I trust the foregoing is satisfactory and I would be pleased to discuss these matters further if it would be helpful

Yours truly,



Per: Vivian Bercovici  
Vice President, General Counsel and  
Corporate Secretary