

INSURANCE BROKERS ASSOCIATION OF MANITOBA

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Carol Shevlin
Policy Manager (A)
CCIR Secretariat
17FI - 5160 Younge Street, Box 85
Toronto, ON M2N 6L9

Via Email: ccir-ccrra@FSCO.GOV.ON.CA

Dear Ms. Shevlin:

RE: Managing Conflicts of Interest – Consultation Paper of February 2006

Your collective consultation papers, culminating in your presentation of February 2006, reveal that you intend ultimately to recommend to CCIR and CISRO three principles “for regulators to consider and industry associations to support as appropriate means to manage actual or potential conflicts of interest associated with insurance advice or transactions”. You present this possibility subject to the within consultation process notwithstanding that such principles are, as you say, “to a large extent, already in place across Canada”.

In spite of a consultation process that has been both appreciated and utilized, our Association has not been convinced by the Industry Practices Review Committee to the effect that either further regulation or amendment to existing regulation is necessary. In fact, the opposite is more likely the case. Currently, industry practice, bylaws of insurance brokers associations across Canada, educational and licensing processes and current law, are together more than enough to produce consequentially positive and productive market outcomes for Canadian insurance consumers.

In essence, the insurance industry specifically and Canadians in general are already over regulated. A professional, legal, and moral market will inevitably protect consumers more than would in this instance additional regulations. Given that the current market is properly and sufficiently addressing priority of client interest, disclosure to consumer and product suitability, IPRC’s attempt to strengthen and/or harmonize existing requirements by advancing your recommended principles through additional regulation would, respectfully, seem redundant.

Yours truly,

INSURANCE BROKERS ASSOCIATION OF MANITOBA

Dave Schioler

David Schioler
Chief Executive Officer

Your Best Insurance is an Insurance Broker

