



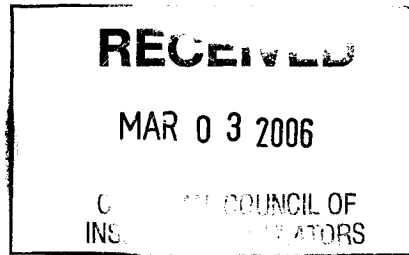
**Canadian Life
and Health Insurance
Association Inc.**

**Association canadienne
des compagnies d'assurances
de personnes inc.**

Gregory R. Traversy
President

March 2, 2006

Mrs. Carol Shevlin
Policy Manager (A)
CCIR Secretariat
5160 Yonge Street, Box 85
17th floor
Toronto, Ontario M2N 6L9



Dear Mrs. Shevlin:

I am writing to provide the views of the Canadian Life and Health Insurance Association with respect to the proposals set out in the CCIR *Discussion Paper on Privilege and Whistle-Blower Protection*.

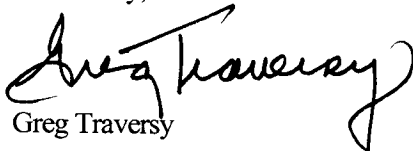
Established in 1894, CLHIA represents companies which together account for 99 per cent of Canada's life and health insurance business. The industry, which provides employment for about 118,000 Canadians and has investments in Canada of about \$315 billion, protects 23 million Canadians through products such as life insurance, annuities, RRSPs, disability insurance and supplementary health plans. It pays benefits of about \$45 billion a year to Canadians and administers about two-thirds of Canada's pension plans.

CLHIA strongly supports the privilege model put forward in the Discussion Paper under which privilege would apply to documents generated as a result of an assessment or other investigation by an insurance company as to its compliance with statutes, regulations, regulatory guidelines, as well as industry, company and professional standards, whether these are undertaken voluntarily or at the request of regulators, and that such privilege would extend to these documents whether in the insurer's or regulators' possession. Moreover, CLHIA also strongly supports risk-based regulation based on self-assessments which are protected by such privilege.

CLHIA also fully supports the Paper's proposals that whistle-blowers be granted immunity from civil liability, as is currently the case in many Canadian jurisdictions, and that privilege also be extended to communications between the regulator and whistle-blower. CLHIA urges all jurisdictions to harmonize their legislation in this respect, so that a similar level of immunity will exist throughout Canada.

Please be assured that CLHIA is committed to continuing to work constructively with CCIR on these important initiatives to move them forward to implementation in all jurisdictions as soon as possible.

Yours truly,


Greg Traversy

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