

October 22, 2020

Mr. Tim Bzowey
Executive Vice-President, Auto/Insurance Products
Financial Services Regulatory Authority (FSRA)
5160 Yonge Street, 16th Floor
Toronto, Ontario, M2N 6L9

Re: Request for comment on a [Common Approach to Treating Insurance Customers Fairly](#).

Dear Mr. Bzowey:

On behalf of Desjardins General Insurance Group (DGIG), I am pleased to respond to your request for comment on a Common Approach to Treating Insurance Customers Fairly.

Desjardins Group provides Canadians with wealth management, life and health insurance, property and casualty insurance, and personal, business and institutional services including payment processing.

DGIG, a subsidiary of Desjardins Group, has become the 2nd largest property and casualty insurer in the country and is the personal use auto insurance market leader in Ontario. We market under the *Desjardins Insurance* brand with two underwriting companies: Certas Direct and Certas Home & Auto which reflects our Desjardins insurance agent network in the province. We also serve the group insurance market through *The Personal* insurance company.

We support FSRA's adoption of CCIR/CISRO Fair Treatment of Customers Guidance

Desjardins agrees with FSRA's proposal that insurance licensees in the home, life, health and auto insurance sectors follow the Fair Treatment of Customers guidance created by Canada's insurance regulatory associations, CCIR and CISRO.

Consumers benefit from a principle-based and consumer-outcome focused approach to regulation that provides room for insurers to compete and innovate while still achieving regulatory intent. For a pan-Canadian insurer like Desjardins, principle-based regulatory harmonization across the country allows us to meet client fair treatment expectations in a universal manner and therefore at the lowest possible administrative cost to our clients.

The Fair Treatment of Customers guidance lessens the need for the continued existence of prescribed process-focused rules in auto insurance, as seen in the Unfair or Deceptive Acts or Practices (UDAP) regulation and Ontario Regulation 664. We are in support of FSRA's indications that as part of separate streams of work, that it will also review these kinds of opportunities to allow the auto insurance system to perform more efficiently and effectively for consumers.

Thank you for the opportunity to provide our commentary.

Sincerely,



Christian Jobidon
Vice-President, Actuarial & Underwriting Services, and Analytics
Desjardins General Insurance Group