

**TO: MEMBERS OF THE FACILITY ASSOCIATION**

**ATTENTION: CHIEF EXECUTIVE OFFICER**

**BULLETIN NO.: F2022 - 37**

**DATE: JUNE 23, 2022**

**SUBJECT: REPLY REQUESTED: MAIL VOTE - PLAN OF OPERATION AMENDMENTS  
RISK SHARING POOLS EXPENSE FACTOR**

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The Facility Association (FA) Board of Directors (Board) has proposed the attached amendments to the Articles of Facility Association's Plan of Operation, and is seeking members' approval for them.

**Background**

With the transition to IFRS17 reporting standards, members are required to account for the cessions and assumptions of the Risk Sharing Pools as reinsurance, as opposed to the IFRS4 standard of accounting for them as net-direct premium. In consequence, **the calculation of provincial premium tax for automobile lines, and where applicable provincial health levies, will be based on gross premium written, without consideration of the net impact of the RSPs.**

Beginning in January of 2023, members will be accountable for the premium tax and applicable provincial health levies on auto risks written and ceded to the RSPs. Members will no longer be accountable for premium tax and applicable health levies on automobile premium assumed from the RSPs. In order to ensure the continued neutrality of premium tax calculation for members, (no member neither benefits nor is disadvantaged by the shift to IFRS17 accounting), the FA proposes to amend the calculation of the annual expense provision permitted for members ceding risks to the RSPs.

Members are advised that there is no change in the calculation of premium tax and health levies as regards FARM.

An example of the impact of IFRS17 accounting on the calculation of premium tax for RSP is provided in **Appendix 1** for your convenience.

**FA Plan of Operation proposed changes:**

The following five proposed changes require amendment to the Plan of Operation and are recommended by the Board of Directors for members' approval:

**1. Article XI.1 – Ontario Risk Sharing Pool**

- 6(b) *The member shall be entitled as a result of the transfer of premium to an expense allowance in an amount equal to a percentage of the written premium applicable to the transferred coverages, such percentage for use during a calendar year to be calculated on the basis set out in the Accounting and Statistical Manual using the base information employed to calculate the expense factor included in the member's rate filing with respect to private passenger vehicle coverage last approved by the applicable rate approving body for the jurisdiction in which the Ontario Pool is operating prior to August 31<sup>st</sup> of the year immediately prior to the calendar year in which the transfer is made. The Board shall from time to time establish a maximum percentage of premium for such expense allowance and if the calculation of the member's expense allowance percentage is higher than such percentage, then the percentage established by the Board as a maximum shall be used.*
- 6(d) *Such allowance is to settle all expenses incurred by the member including acquisition costs, operating costs and loss adjustment costs, but not including premium taxes and professional fees (such professional fees to be stipulated in the Ontario Risk Sharing Pool Claims Guide with compensation to be as therein directed).*

**2. Article XI.2 – Alberta Risk Sharing Pool**

- 5(b) *The member shall be entitled as a result of the transfer of premium to an expense allowance in an amount equal to a percentage of the written premium applicable to the transferred coverages, such percentage for use during a calendar year to be determined by the Board in consultation with the Superintendent of Insurance.*
- 5(c) *Such allowance is to settle all expenses incurred by the member including acquisition costs, operating costs and loss adjustment costs, but not including premium taxes and professional fees (such professional fees to be stipulated in the Alberta Risk Sharing Pool Claims Guide with compensation to be as therein directed).*

**3. Article XI.3 – New Brunswick Risk Sharing Pool**

- 5(b) *The member shall be entitled as a result of the transfer of premium to an expense allowance in an amount equal to a percentage of the written premium applicable to the transferred coverages, such percentage for use during a calendar year to be determined by the Board.*
- 5(c) *Such allowance is to settle all expenses incurred by the member including acquisition costs, operating costs and loss adjustment costs, but not including premium taxes and professional fees (such professional fees to be stipulated in the applicable Risk Sharing Pool Claims Guide with compensation to be as therein directed).*

**4. Article XI.4 – Nova Scotia Risk Sharing Pool**

- 5(b) *The member shall be entitled as a result of the transfer of premium to an expense allowance in an amount equal to a percentage of the written premium applicable to the transferred coverages, such percentage for use during a calendar year to be determined by the Board.*
- 5(c) *Such allowance is to settle all expenses incurred by the member including acquisition costs, operating costs and loss adjustment costs, but not including premium taxes and professional fees (such professional fees to be stipulated in the applicable Risk Sharing Pool Claims Guide with compensation to be as therein directed).*

**5. Article XI.5 – Newfoundland & Labrador Risk Sharing Pool**

- 5(b) *The member shall be entitled as a result of the transfer of premium to an expense allowance in an amount equal to a percentage of the written premium applicable to the transferred coverages, such percentage for use during a calendar year to be determined by the Board.*
- 5(c) *Such allowance is to settle all expenses incurred by the member including acquisition costs, operating costs and loss adjustment costs, but not including premium taxes and professional fees (such professional fees to be stipulated in the applicable Risk Sharing Pool Claims Guide with compensation to be as therein directed).*

Pending member approval and regulatory approval of the above Plan of Operation changes, the FA Board will be asked to approve revised expense factors for the RSPs which include a provision for premium tax and applicable health levies as appropriate, to be applied for transfers beginning January 2023.

Members should be aware that:

The Facility Association Plan of Operation is authorized by statute in the jurisdictions Facility Association serves. Amending the Plan requires approval of the proposed amendments by **at least 51% of member votes within 60 days of the vote mailing and the appropriate regulatory approvals.**

Please review the proposed changes and vote using the ballot provided as **Appendix 2**. Please note only one ballot is required from each member company group. For ease of reference, **Appendix 3** shows all member company groups and their corresponding vote allotments.

**Although the mail vote will formally close after 60 days, please return the completed ballot at your earliest convenience.**

If the proposed amendments are approved, members will be advised of the relevant effective dates and implementation timelines.

If you have any questions regarding the proposed changes to the Plan and/or the voting process, please contact me directly at 416-644-4915 or at [smatheson@facilityassociation.com](mailto:smatheson@facilityassociation.com).

Saskia Matheson  
President & CEO

Attached.

## Appendix 1

EXAMPLE : The following is provided as an illustration of the impact of changes to the expense provision for the RSP's to include the cost of premium tax. It is a simplification for the purpose of illustration and is therefore exclusive of transferred losses, or additional claims expenses, neither of which is affected by the proposed change. It is important to note that on a province-wide basis, the total premium does not change, and thus the total premium tax payable does not change.

### Industry Information - Alberta

<b>Total Premium written</b>	\$	4,200,000,000
<b>Total Premium Ceded to RSP</b>	\$	210,000,000
<b>Total Losses Ceded to RSP</b>	\$	283,500,000

### RSP Information - Alberta

<b>Loss Ratio</b>	135%
<b>Expense Ratio ( excl. prem tax)</b>	30%
<b>Premium tax rate</b>	3%
<b>Expense Ratio ( incl. prem tax)</b>	33%

### Company ABC Information - Alberta

<b>ABC Premium written</b>	\$	420,000,000
<b>ABC Ceded to RSP</b>	\$	6,300,000
<b>ABC Assumed from RSP</b>	\$	21,000,000
<b>ABC Market share</b>		10%
<b>ABC Share of total RSP</b>		3%

		<b>IFRS 4</b>		<b>IFRS 17</b>	
Premium written	\$	420,000,000	\$	420,000,000	Premium written
Ceded to RSP	\$	6,300,000	\$	6,300,000	Ceded to RSP
Assumed from RSP	\$	21,000,000	\$	21,000,000	Assumed from RSP
Premium Used by Provinces for Premium Tax calculation	\$	434,700,000	\$	420,000,000	Premium Used by Provinces for Premium Tax calculation
Premium tax paid (3% of Net Direct)	\$	13,041,000	\$	12,600,000	Premium tax paid (3% of Premium Written, exclusive of RSP impact)
Expenses recouped from RSP on Cessions (30%)	\$	1,890,000	\$	2,079,000	Expenses recouped from RSP on Cessions (33%)
Share of RSP Losses	\$	28,350,000	\$	28,350,000	Share of RSP Losses
Share of RSP Expenses	\$	6,300,000	\$	6,930,000	Share of RSP Expenses (incl. premium tax)
Cost to ABC, exclusive of benefit of any RSP claims ceded		<b>\$ 45,801,000</b>		<b>\$ 45,801,000</b>	Cost to ABC, exclusive of benefit of any RSP claims ceded

**BALLOT**

\_\_\_\_\_ as a member of the Facility Association hereby,  
Company name

pursuant to Article XX section 2 of the Plan of Operation of Facility Association; approves

and consents to ☐

disapproves of and opposes ☐

The proposed amendments to the Plan of Operation of Facility Association is set out in the attachment to Bulletin F2022-37.

Dated the \_\_\_\_\_ day of \_\_\_\_\_ 2022

\_\_\_\_\_  
Signature: Name

Per: \_\_\_\_\_

Title: \_\_\_\_\_

Please sign and return the Ballot to Tina Cheung [tcheung@facilityassociation.com](mailto:tcheung@facilityassociation.com)  
[on/before August 22 2022](#)

Facility Association Residual Market  
Voting Rights Report



*Jurisdiction: all jurisdiction*

*Source: total volume of voluntary automobile direct written premium in 2021*

Votes	Company
8	<b><u>AIG Canada Group</u></b> AIG Insurance Company of Canada
30	<b><u>Alberta Motor Association Insurance Company</u></b> Alberta Motor Association Insurance Company
1	<b><u>Allianz Global Risk US - Group</u></b> Allianz Global Risks US Insurance Company
219	<b><u>Allstate Canada Group</u></b> Pembroke Insurance Company Pafco Insurance Company Allstate Insurance Company of Canada
2	<b><u>Arch Insurance Company</u></b> Arch Insurance Canada Ltd.
348	<b><u>Aviva Canada Inc Group</u></b> Aviva General Insurance Company Aviva Insurance Company of Canada S&Y Insurance Company Traders General Insurance Company Scottish & York Insurance Co. Limited Elite Insurance Company
61	<b><u>CAA Insurance Company Group</u></b> CAA Insurance Company
4	<b><u>Cherokee Insurance Company</u></b> Cherokee Insurance Company
26	<b><u>Chubb Group</u></b> Chubb Insurance Company of Canada
5	<b><u>CNA Financial Corporation</u></b> Continental Casualty Company
231	<b><u>Co-operators Group</u></b> Co-operators General Insurance Company The Sovereign General Insurance Company Cumis General Insurance Company Cosco Insurance Company
14	<b><u>Commonwell Mutual Insurance Group</u></b> The Commonwell Mutual Insurance Group
225	<b><u>Definity Group</u></b> Definity Insurance Company Sonnet Insurance Company

409

**Desjardins General Insurance Group Inc.**

Certas Home and Auto Insurance Company

Certas Direct Insurance Company

The Personal Insurance Company

48

**Echelon Insurance**

Echelon Insurance

1

**Electric Insurance Company**

Electric Insurance Company

1

**Everest Insurance Company of CDA**

Everest Insurance Company of Canada

**Farmers Mutual Reinsurance Plan**

1

01-Algoma Mutual Insurance Company

3

03-Ayr Farmers Mutual Insurance Company

2

05-BCM Insurance Company

1

07-Brant Mutual Insurance Company

1

09-Cayuga Mutual Insurance Company

1

12-Dufferin Mutual Insurance Company

2

13-Dumfries Mutual Insurance Company

2

14-West Elgin Mutual Insurance Company

1

18-Erie Mutual Fire Insurance Company

2

21-Germania Mutual Insurance Company

1

23-Grenville Mutual Insurance Company

2

25-Halwell Mutual Insurance Company

2

26-HTM Insurance Company

1

27-H T &amp; C Mutual Insurance Company

1

28-Howard Mutual Insurance Company

1

29-Howick Mutual Insurance Company

3

30-Kent &amp; Essex Mutual Insurance Company

2

31-Lambton Mutual Insurance Company

1

33-L &amp; A Mutual Insurance Company

1

37-McKillop Mutual Insurance Company

2

38-Nova Mutual Insurance Company

1

39-North Blenheim Mutual Insurance Compa

1

40-Maple Mutual Insurance Company

2

44-Edge Mutual Insurance Company

2

46-South Easthope Mutual Insurance Compa

1

48-Caradoc Townsend Mutual Insurance Com

1

49-Usborne &amp; Hibbert Mutual Fire Insuran

1

51-Westminster Mutual Insurance Company

1

52-West Wawanosh Mutual Insurance Compan

2

53-Yarmouth Mutual Insurance Company

1

54-Middlesex Mutual Insurance Company

2

55-H T &amp; C Mutual Insurance Company

2

56-Tradition Mutual Insurance Company

3

57-Trillium Mutual Insurance Company

1

**Fortress Insurance Company**

Fortress Insurance Company

37	<b><u>Gore Mutual Insurance Company</u></b>
	Gore Mutual Insurance Company
1	<b><u>Hartford Fire Insurance Company</u></b>
	Hartford Fire Insurance Company
8	<b><u>Heartland Farm Mutual Group</u></b>
	Heartland Farm Mutual Inc.
4	<b><u>Insurance Company of Prince Edward Island Group</u></b>
	The Insurance Company of Prince Edward Island
661	<b><u>Intact Group</u></b>
	Novex Insurance Company
	Intact Insurance Company
	Western Assurance Company
	Intact Insurance Company
	Intact Insurance Company
	Belair Insurance Company Inc
	Canadian Northern Shield Insurance Compa
	Novex Insurance Company
	Royal & Sun Alliance Insurance Company o
	Intact Insurance Company
	Unifund Assurance Company
	Trafalgar Insurance Company of Canada
	Jevco Insurance Company
14	<b><u>La Capitale General Insurance</u></b>
	Unica Insurance Inc. / Unica Assurances Inc.
5	<b><u>Liberty Mutual Insurance Company</u></b>
	Liberty Mutual Insurance Company
4	<b><u>Lloyds Underwriters</u></b>
	Lloyd's Underwriters
7	<b><u>Millennium Insurance Group</u></b>
	Millennium Insurance Corporation
1	<b><u>Mitsui Sumitomo Insurance</u></b>
	Mitsui Sumitomo Insurance Company Limited
1	<b><u>National Liability &amp; Fire Insurance Company</u></b>
	National Liability & Fire Insurance Company
106	<b><u>Northbridge Financial Corporation</u></b>
	Federated Insurance Company of Canada
	Zenith Insurance Company
	Verassure Insurance Company
	Northbridge General Insurance Corporation
14	<b><u>Old Republic Insurance Company of Canada</u></b>
	Old Republic Insurance Company of Canada
5	<b><u>Optimum Insurance Group</u></b>
	Optimum West Insurance Company Inc.
	Optimum Insurance Company Inc.
16	<b><u>Peace Hills General Insurance Company</u></b>
	Peace Hills General Insurance Company
4	<b><u>Peel Mutual Insurance Company Group</u></b>
	Peel Mutual Insurance Company



10	<b><u>Portage la Prairie Mutual Ins</u></b>
	Portage la Prairie Mutual Insurance Company (The)
2	<b><u>Promutuel de la Estuaire societe mutuelle d'assura</u></b>
	Promutuel de la Estuaire societe mutuelle d'assura
1	<b><u>Protective Insurance Company</u></b>
	Protective Insurance Company
1	<b><u>Sentry Insurance a Mutual Company</u></b>
	Sentry Insurance Company
25	<b><u>SGL Canada Insurance Services Ltd.</u></b>
	SGL Canada Insurance Services Limited
	Coachman Insurance Company
2	<b><u>Starr Insurance and Reinsurance Limited</u></b>
	Starr Insurance and Reinsurance Limited
356	<b><u>TD Insurance Group</u></b>
	TD Home and Auto Insurance Company
	TD General Insurance Company
	Security National Insurance Company
	Primum Insurance Company
2	<b><u>Technology Insurance Company</u></b>
	Technology Insurance Company Inc
2	<b><u>Tokio Marine &amp; Nichido Fire Insurance</u></b>
	Tokio Marine & Nichido Fire Insurance Co. Ltd.
100	<b><u>Travelers Insurance Companies Inc.</u></b>
	The Dominion of Canada General Insurance Company
	Travelers Essential
	St. Paul Fire and Marine Insurance Company
	Travelers Insurance Company of Canada
2	<b><u>United General Insurance Corporation</u></b>
	United General Insurance Corporation
182	<b><u>Wawanesa Mutual Insurance Company</u></b>
	The Wawanesa Mutual Insurance Company
2	<b><u>XL Speciality Insurance Company</u></b>
	XL Specialty Insurance Company
15	<b><u>Zurich Insurance Company Ltd</u></b>
	Zurich Insurance Company Ltd
3277	

Facility Association Residual Market  
Voting Rights Report



Jurisdiction: Ontario

Source: total volume of voluntary automobile direct written premium in 2021

Votes	Company
6	<b><u>AIG Canada Group</u></b> AIG Insurance Company of Canada
1	<b><u>Allianz Global Risk US - Group</u></b> Allianz Global Risks US Insurance Company
170	<b><u>Allstate Canada Group</u></b> Pembroke Insurance Company Pafco Insurance Company Allstate Insurance Company of Canada
2	<b><u>Arch Insurance Company</u></b> Arch Insurance Canada Ltd.
271	<b><u>Aviva Canada Inc Group</u></b> Aviva General Insurance Company Aviva Insurance Company of Canada S&Y Insurance Company Traders General Insurance Company Scottish & York Insurance Co. Limited Elite Insurance Company
57	<b><u>CAA Insurance Company Group</u></b> CAA Insurance Company
4	<b><u>Cherokee Insurance Company</u></b> Cherokee Insurance Company
21	<b><u>Chubb Group</u></b> Chubb Insurance Company of Canada
3	<b><u>CNA Financial Corporation</u></b> Continental Casualty Company
159	<b><u>Co-operators Group</u></b> Co-operators General Insurance Company The Sovereign General Insurance Company Cumis General Insurance Company Cosco Insurance Company
14	<b><u>Commonwell Mutual Insurance Group</u></b> The Commonwell Mutual Insurance Group
175	<b><u>Definity Group</u></b> Definity Insurance Company Sonnet Insurance Company

338

**Desjardins General Insurance Group Inc.**

Certas Home and Auto Insurance Company

Certas Direct Insurance Company

The Personal Insurance Company

42

**Echelon Insurance**

Echelon Insurance

1

**Electric Insurance Company**

Electric Insurance Company

1

**Everest Insurance Company of CDA**

Everest Insurance Company of Canada

**Farmers Mutual Reinsurance Plan**

1

01-Algoma Mutual Insurance Company

3

03-Ayr Farmers Mutual Insurance Company

2

05-BCM Insurance Company

1

07-Brant Mutual Insurance Company

1

09-Cayuga Mutual Insurance Company

1

12-Dufferin Mutual Insurance Company

2

13-Dumfries Mutual Insurance Company

2

14-West Elgin Mutual Insurance Company

1

18-Erie Mutual Fire Insurance Company

2

21-Germania Mutual Insurance Company

1

23-Grenville Mutual Insurance Company

2

25-Halwell Mutual Insurance Company

2

26-HTM Insurance Company

1

27-H T &amp; C Mutual Insurance Company

1

28-Howard Mutual Insurance Company

1

29-Howick Mutual Insurance Company

3

30-Kent &amp; Essex Mutual Insurance Company

2

31-Lambton Mutual Insurance Company

1

33-L &amp; A Mutual Insurance Company

1

37-McKillop Mutual Insurance Company

2

38-Nova Mutual Insurance Company

1

39-North Blenheim Mutual Insurance Compa

1

40-Maple Mutual Insurance Company

2

44-Edge Mutual Insurance Company

2

46-South Easthope Mutual Insurance Compa

1

48-Caradoc Townsend Mutual Insurance Com

1

49-Usborne &amp; Hibbert Mutual Fire Insuran

1

51-Westminster Mutual Insurance Company

1

52-West Wawanosh Mutual Insurance Compan

2

53-Yarmouth Mutual Insurance Company

1

54-Middlesex Mutual Insurance Company

2

55-H T &amp; C Mutual Insurance Company

2

56-Tradition Mutual Insurance Company

3

57-Trillium Mutual Insurance Company

37

**Gore Mutual Insurance Company**

Gore Mutual Insurance Company

1	<b><u>Hartford Fire Insurance Company</u></b>
	Hartford Fire Insurance Company
8	<b><u>Heartland Farm Mutual Group</u></b>
	Heartland Farm Mutual Inc.
454	<b><u>Intact Group</u></b>
	Novex Insurance Company
	Intact Insurance Company
	Western Assurance Company
	Intact Insurance Company
	Intact Insurance Company
	Belair Insurance Company Inc
	Canadian Northern Shield Insurance Compa
	Royal & Sun Alliance Insurance Company o
	Intact Insurance Company
	Unifund Assurance Company
	Jevco Insurance Company
14	<b><u>La Capitale General Insurance</u></b>
	Unica Insurance Inc. / Unica Assurances Inc.
3	<b><u>Liberty Mutual Insurance Company</u></b>
	Liberty Mutual Insurance Company
3	<b><u>Lloyds Underwriters</u></b>
	Lloyd's Underwriters
1	<b><u>Mitsui Sumitomo Insurance</u></b>
	Mitsui Sumitomo Insurance Company Limited
1	<b><u>National Liability &amp; Fire Insurance Company</u></b>
	National Liability & Fire Insurance Company
78	<b><u>Northbridge Financial Corporation</u></b>
	Federated Insurance Company of Canada
	Zenith Insurance Company
	Verassure Insurance Company
	Northbridge General Insurance Corporation
13	<b><u>Old Republic Insurance Company of Canada</u></b>
	Old Republic Insurance Company of Canada
4	<b><u>Optimum Insurance Group</u></b>
	Optimum Insurance Company Inc.
4	<b><u>Peel Mutual Insurance Company Group</u></b>
	Peel Mutual Insurance Company
5	<b><u>Portage la Prairie Mutual Ins</u></b>
	Portage la Prairie Mutual Insurance Company (The)
1	<b><u>Protective Insurance Company</u></b>
	Protective Insurance Company
1	<b><u>Sentry Insurance a Mutual Company</u></b>
	Sentry Insurance Company
13	<b><u>SGL Canada Insurance Services Ltd.</u></b>
	SGL Canada Insurance Services Limited
	Coachman Insurance Company
2	<b><u>Starr Insurance and Reinsurance Limited</u></b>
	Starr Insurance and Reinsurance Limited

211	<b><u>TD Insurance Group</u></b> TD Home and Auto Insurance Company Security National Insurance Company Primmum Insurance Company
2	<b><u>Technology Insurance Company</u></b> Technology Insurance Company Inc
2	<b><u>Tokio Marine &amp; Nichido Fire Insurance</u></b> Tokio Marine & Nichido Fire Insurance Co. Ltd.
76	<b><u>Travelers Insurance Companies Inc.</u></b> The Dominion of Canada General Insurance Company Travelers Essential St. Paul Fire and Marine Insurance Company Travelers Insurance Company of Canada
73	<b><u>Wawanesa Mutual Insurance Company</u></b> The Wawanesa Mutual Insurance Company
2	<b><u>XL Speciality Insurance Company</u></b> XL Specialty Insurance Company
10	<b><u>Zurich Insurance Company Ltd</u></b> Zurich Insurance Company Ltd
2337	

Facility Association Residual Market  
Voting Rights Report



Jurisdiction: Alberta

Source: total volume of voluntary automobile direct written premium in 2021

Votes	Company
1	<b><u>AIG Canada Group</u></b> AIG Insurance Company of Canada
30	<b><u>Alberta Motor Association Insurance Company</u></b> Alberta Motor Association Insurance Company
1	<b><u>Allianz Global Risk US - Group</u></b> Allianz Global Risks US Insurance Company
33	<b><u>Allstate Canada Group</u></b> Pembroke Insurance Company Allstate Insurance Company of Canada
1	<b><u>Arch Insurance Company</u></b> Arch Insurance Canada Ltd.
45	<b><u>Aviva Canada Inc Group</u></b> Aviva General Insurance Company Aviva Insurance Company of Canada S&Y Insurance Company Traders General Insurance Company Elite Insurance Company
4	<b><u>Chubb Group</u></b> Chubb Insurance Company of Canada
2	<b><u>CNA Financial Corporation</u></b> Continental Casualty Company
52	<b><u>Co-operators Group</u></b> Co-operators General Insurance Company The Sovereign General Insurance Company Cumis General Insurance Company Coseco Insurance Company
32	<b><u>Definity Group</u></b> Definity Insurance Company Sonnet Insurance Company
58	<b><u>Desjardins General Insurance Group Inc.</u></b> Certas Home and Auto Insurance Company Certas Direct Insurance Company The Personal Insurance Company
1	<b><u>Echelon Insurance</u></b> Echelon Insurance
1	<b><u>Electric Insurance Company</u></b> Electric Insurance Company

1	<b><u>Everest Insurance Company of CDA</u></b>
	Everest Insurance Company of Canada
1	<b><u>Fortress Insurance Company</u></b>
	Fortress Insurance Company
1	<b><u>Gore Mutual Insurance Company</u></b>
	Gore Mutual Insurance Company
1	<b><u>Hartford Fire Insurance Company</u></b>
	Hartford Fire Insurance Company
146	<b><u>Intact Group</u></b>
	Intact Insurance Company
	Intact Insurance Company
	Intact Insurance Company
	Intact Insurance Company
	Belair Insurance Company Inc
	Canadian Northern Shield Insurance Compa
	Royal & Sun Alliance Insurance Company o
	Intact Insurance Company
	Unifund Assurance Company
2	<b><u>Liberty Mutual Insurance Company</u></b>
	Liberty Mutual Insurance Company
1	<b><u>Lloyds Underwriters</u></b>
	Lloyd's Underwriters
7	<b><u>Millennium Insurance Group</u></b>
	Millennium Insurance Corporation
1	<b><u>Mitsui Sumitomo Insurance</u></b>
	Mitsui Sumitomo Insurance Company Limited
1	<b><u>National Liability &amp; Fire Insurance Company</u></b>
	National Liability & Fire Insurance Company
20	<b><u>Northbridge Financial Corporation</u></b>
	Federated Insurance Company of Canada
	Zenith Insurance Company
	Northbridge General Insurance Corporation
2	<b><u>Old Republic Insurance Company of Canada</u></b>
	Old Republic Insurance Company of Canada
2	<b><u>Optimum Insurance Group</u></b>
	Optimum West Insurance Company Inc.
15	<b><u>Peace Hills General Insurance Company</u></b>
	Peace Hills General Insurance Company
4	<b><u>Portage la Prairie Mutual Ins</u></b>
	Portage la Prairie Mutual Insurance Company
1	<b><u>Protective Insurance Company</u></b>
	Protective Insurance Company
1	<b><u>Sentry Insurance a Mutual Company</u></b>
	Sentry Insurance Company
12	<b><u>SGI Canada Insurance Services Ltd.</u></b>
	SGI Canada Insurance Services Limited
1	<b><u>Starr Insurance and Reinsurance Limited</u></b>
	Starr Insurance and Reinsurance Limited

105	<b><u>TD Insurance Group</u></b> TD Home and Auto Insurance Company Security National Insurance Company Primmum Insurance Company
1	<b><u>Tokio Marine &amp; Nichido Fire Insurance</u></b> Tokio Marine & Nichido Fire Insurance Co. Ltd.
16	<b><u>Travelers Insurance Companies Inc.</u></b> The Dominion of Canada General Insurance Company St. Paul Fire and Marine Insurance Company Travelers Insurance Company of Canada
92	<b><u>Wawanesa Mutual Insurance Company</u></b> The Wawanesa Mutual Insurance Company
1	<b><u>XL Speciality Insurance Company</u></b> XL Specialty Insurance Company
4	<b><u>Zurich Insurance Company Ltd</u></b> Zurich Insurance Company Ltd
700	



Facility Association Residual Market  
Voting Rights Report



Jurisdiction: New Brunswick

Source: total volume of voluntary automobile direct written premium in 2021

Votes	Company
1	<b><u>AIG Canada Group</u></b> AIG Insurance Company of Canada
9	<b><u>Allstate Canada Group</u></b> Pembroke Insurance Company Pafco Insurance Company Allstate Insurance Company of Canada
1	<b><u>Arch Insurance Company</u></b> Arch Insurance Canada Ltd.
9	<b><u>Aviva Canada Inc Group</u></b> Aviva General Insurance Company Aviva Insurance Company of Canada S&Y Insurance Company Traders General Insurance Company Elite Insurance Company
2	<b><u>CAA Insurance Company Group</u></b> CAA Insurance Company
1	<b><u>Chubb Group</u></b> Chubb Insurance Company of Canada
1	<b><u>CNA Financial Corporation</u></b> Continental Casualty Company
6	<b><u>Co-operators Group</u></b> Co-operators General Insurance Company The Sovereign General Insurance Company Cumis General Insurance Company
9	<b><u>Definity Group</u></b> Definity Insurance Company Sonnet Insurance Company
8	<b><u>Desjardins General Insurance Group Inc.</u></b> Certas Home and Auto Insurance Company The Personal Insurance Company
2	<b><u>Echelon Insurance</u></b> Echelon Insurance
1	<b><u>Electric Insurance Company</u></b> Electric Insurance Company
1	<b><u>Everest Insurance Company of CDA</u></b> Everest Insurance Company of Canada

1	<b><u>Gore Mutual Insurance Company</u></b>
	Gore Mutual Insurance Company
1	<b><u>Hartford Fire Insurance Company</u></b>
	Hartford Fire Insurance Company
2	<b><u>Insurance Company of Prince Edward Island Group</u></b>
	The Insurance Company of Prince Edward Island
12	<b><u>Intact Group</u></b>
	Intact Insurance Company
	Intact Insurance Company
	Intact Insurance Company
	Royal & Sun Alliance Insurance Company o
	Intact Insurance Company
	Unifund Assurance Company
	Trafalgar Insurance Company of Canada
1	<b><u>Liberty Mutual Insurance Company</u></b>
	Liberty Mutual Insurance Company
1	<b><u>Lloyds Underwriters</u></b>
	Lloyd's Underwriters
1	<b><u>Mitsui Sumitomo Insurance</u></b>
	Mitsui Sumitomo Insurance Company Limited
1	<b><u>National Liability &amp; Fire Insurance Company</u></b>
	National Liability & Fire Insurance Company
4	<b><u>Northbridge Financial Corporation</u></b>
	Federated Insurance Company of Canada
	Zenith Insurance Company
	Northbridge General Insurance Corporation
1	<b><u>Old Republic Insurance Company of Canada</u></b>
	Old Republic Insurance Company of Canada
1	<b><u>Portage la Prairie Mutual Ins</u></b>
	Portage la Prairie Mutual Insurance Company (The)
2	<b><u>Promutuel de la Estuaire societe mutuelle d'assurance</u></b>
	Promutuel de la Estuaire societe mutuelle d'assura
1	<b><u>Protective Insurance Company</u></b>
	Protective Insurance Company
1	<b><u>Sentry Insurance a Mutual Company</u></b>
	Sentry Insurance Company
1	<b><u>Starr Insurance and Reinsurance Limited</u></b>
	Starr Insurance and Reinsurance Limited
11	<b><u>TD Insurance Group</u></b>
	TD Home and Auto Insurance Company
	Security National Insurance Company
	Primum Insurance Company
1	<b><u>Tokio Marine &amp; Nichido Fire Insurance</u></b>
	Tokio Marine & Nichido Fire Insurance Co. Ltd.
2	<b><u>Travelers Insurance Companies Inc.</u></b>
	The Dominion of Canada General Insurance Company
	St. Paul Fire and Marine Insurance Company
	Travelers Insurance Company of Canada

2	<b><u>United General Insurance Corporation</u></b> United General Insurance Corporation
10	<b><u>Wawanesa Mutual Insurance Company</u></b> The Wawanesa Mutual Insurance Company
1	<b><u>XL Speciality Insurance Company</u></b> XL Specialty Insurance Company
1	<b><u>Zurich Insurance Company Ltd</u></b> Zurich Insurance Company Ltd
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Facility Association Residual Market  
Voting Rights Report



Jurisdiction: Nova Scotia

Source: total volume of voluntary automobile direct written premium in 2021

Votes	Company
1	<b><u>AIG Canada Group</u></b> AIG Insurance Company of Canada
1	<b><u>Allianz Global Risk US - Group</u></b> Allianz Global Risks US Insurance Company
9	<b><u>Allstate Canada Group</u></b> Pembroke Insurance Company Pafco Insurance Company Allstate Insurance Company of Canada
1	<b><u>Arch Insurance Company</u></b> Arch Insurance Canada Ltd.
10	<b><u>Aviva Canada Inc Group</u></b> Aviva General Insurance Company Aviva Insurance Company of Canada Traders General Insurance Company Elite Insurance Company
3	<b><u>CAA Insurance Company Group</u></b> CAA Insurance Company
1	<b><u>Chubb Group</u></b> Chubb Insurance Company of Canada
1	<b><u>CNA Financial Corporation</u></b> Continental Casualty Company
6	<b><u>Co-operators Group</u></b> Co-operators General Insurance Company The Sovereign General Insurance Company Cumis General Insurance Company Cosco Insurance Company
10	<b><u>Definity Group</u></b> Definity Insurance Company Sonnet Insurance Company
4	<b><u>Desjardins General Insurance Group Inc.</u></b> The Personal Insurance Company
3	<b><u>Echelon Insurance</u></b> Echelon Insurance
1	<b><u>Electric Insurance Company</u></b> Electric Insurance Company
1	<b><u>Everest Insurance Company of CDA</u></b> Everest Insurance Company of Canada

1	<b><u>Gore Mutual Insurance Company</u></b>
	Gore Mutual Insurance Company
1	<b><u>Hartford Fire Insurance Company</u></b>
	Hartford Fire Insurance Company
2	<b><u>Insurance Company of Prince Edward Island Group</u></b>
	The Insurance Company of Prince Edward Island
22	<b><u>Intact Group</u></b>
	Novex Insurance Company
	Intact Insurance Company
	Intact Insurance Company
	Intact Insurance Company
	Royal & Sun Alliance Insurance Company o
	Intact Insurance Company
	Unifund Assurance Company
	Trafalgar Insurance Company of Canada
1	<b><u>Liberty Mutual Insurance Company</u></b>
	Liberty Mutual Insurance Company
1	<b><u>Lloyds Underwriters</u></b>
	Lloyd's Underwriters
1	<b><u>Mitsui Sumitomo Insurance</u></b>
	Mitsui Sumitomo Insurance Company Limited
1	<b><u>National Liability &amp; Fire Insurance Company</u></b>
	National Liability & Fire Insurance Company
3	<b><u>Northbridge Financial Corporation</u></b>
	Federated Insurance Company of Canada
	Zenith Insurance Company
	Northbridge General Insurance Corporation
2	<b><u>Portage la Prairie Mutual Ins</u></b>
	Portage la Prairie Mutual Insurance Company (The)
1	<b><u>Protective Insurance Company</u></b>
	Protective Insurance Company
1	<b><u>Sentry Insurance a Mutual Company</u></b>
	Sentry Insurance Company
23	<b><u>TD Insurance Group</u></b>
	TD Home and Auto Insurance Company
	Security National Insurance Company
	Primmum Insurance Company
1	<b><u>Tokio Marine &amp; Nichido Fire Insurance</u></b>
	Tokio Marine & Nichido Fire Insurance Co. Ltd.
3	<b><u>Travelers Insurance Companies Inc.</u></b>
	The Dominion of Canada General Insurance Company
	St. Paul Fire and Marine Insurance Company
	Travelers Insurance Company of Canada
1	<b><u>United General Insurance Corporation</u></b>
	United General Insurance Corporation
7	<b><u>Wawanesa Mutual Insurance Company</u></b>
	The Wawanesa Mutual Insurance Company

1	<u><b>XL Speciality Insurance Company</b></u> XL Specialty Insurance Company
1	<u><b>Zurich Insurance Company Ltd</b></u> Zurich Insurance Company Ltd
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Facility Association Residual Market  
Voting Rights Report



Jurisdiction: Newfoundland

Source: total volume of voluntary automobile direct written premium in 2021

Votes	Company
1	<b><u>AIG Canada Group</u></b> AIG Insurance Company of Canada
1	<b><u>Allianz Global Risk US - Group</u></b> Allianz Global Risks US Insurance Company
1	<b><u>Arch Insurance Company</u></b> Arch Insurance Canada Ltd.
11	<b><u>Aviva Canada Inc Group</u></b> Aviva General Insurance Company Aviva Insurance Company of Canada S&Y Insurance Company Traders General Insurance Company Elite Insurance Company
1	<b><u>Chubb Group</u></b> Chubb Insurance Company of Canada
1	<b><u>CNA Financial Corporation</u></b> Continental Casualty Company
7	<b><u>Co-operators Group</u></b> Co-operators General Insurance Company The Sovereign General Insurance Company Cumis General Insurance Company Coseco Insurance Company
1	<b><u>Definity Group</u></b> Definity Insurance Company Sonnet Insurance Company
2	<b><u>Desjardins General Insurance Group Inc.</u></b> The Personal Insurance Company
1	<b><u>Electric Insurance Company</u></b> Electric Insurance Company
1	<b><u>Everest Insurance Company of CDA</u></b> Everest Insurance Company of Canada
1	<b><u>Hartford Fire Insurance Company</u></b> Hartford Fire Insurance Company

27	<b><u>Intact Group</u></b>
	Intact Insurance Company
	Intact Insurance Company
	Intact Insurance Company
	Canadian Northern Shield Insurance Compa
	Novex Insurance Company
	Royal & Sun Alliance Insurance Company o
	Unifund Assurance Company
1	<b><u>Liberty Mutual Insurance Company</u></b>
	Liberty Mutual Insurance Company
1	<b><u>Lloyds Underwriters</u></b>
	Lloyd's Underwriters
1	<b><u>Mitsui Sumitomo Insurance</u></b>
	Mitsui Sumitomo Insurance Company Limited
1	<b><u>National Liability &amp; Fire Insurance Company</u></b>
	National Liability & Fire Insurance Company
2	<b><u>Northbridge Financial Corporation</u></b>
	Northbridge General Insurance Corporation
1	<b><u>Old Republic Insurance Company of Canada</u></b>
	Old Republic Insurance Company of Canada
1	<b><u>Sentry Insurance a Mutual Company</u></b>
	Sentry Insurance Company
1	<b><u>Starr Insurance and Reinsurance Limited</u></b>
	Starr Insurance and Reinsurance Limited
5	<b><u>TD Insurance Group</u></b>
	TD Home and Auto Insurance Company
	Security National Insurance Company
	Primmum Insurance Company
1	<b><u>Tokio Marine &amp; Nichido Fire Insurance</u></b>
	Tokio Marine & Nichido Fire Insurance Co. Ltd.
3	<b><u>Travelers Insurance Companies Inc.</u></b>
	The Dominion of Canada General Insurance Company
	Travelers Insurance Company of Canada
1	<b><u>XL Speciality Insurance Company</u></b>
	XL Specialty Insurance Company
1	<b><u>Zurich Insurance Company Ltd</u></b>
	Zurich Insurance Company Ltd
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