



February 8, 2017

Sent by email to: Legc.office@novascotia.ca

Dear Sir/Madam:

Thank you for the opportunity to comment on Nova Scotia's Bill 59, the *Accessibility Act*. The CLHIA supports the establishment of rules to promote accessibility for persons with disabilities. It is our view that a strong legislative framework helps those with disabilities realize their full potential by enabling their participation in economic and social activities from which they might otherwise be excluded.

The CLHIA is a voluntary association with member companies which account for 99 per cent of Canada's life and health insurance business. The life and health insurance industry is a significant economic and social contributor in Nova Scotia. It protects approximately 730,000 million Nova Scotia residents and makes \$2.3 billion a year in benefit payments to residents in Nova Scotia (of which 90 per cent goes to living policyholders as annuity, disability, supplementary health or other benefits, and the remaining 10 per cent goes to beneficiaries as death claims). In addition, the industry has \$18 billion invested in Nova Scotia's economy. Seventy-two life and health insurance providers are licensed to operate in Nova Scotia.

Harmonization of Standards

While the proposed *Accessibility Act* will provide the framework for setting out standards by which government and the private sector must abide, the standards themselves will be the most important determinant of how accessibility is furthered and what obligations organizations will need to follow. You may recall that we provided a submission on December 3, 2014 on the accessibility consultation paper, where we commended Nova Scotia for explicitly recognizing the Ontario and Manitoba initiatives in the area of accessibility. Our industry has consistently urged provinces to harmonize their requirements in order to reduce compliance costs and the risks of non-compliance. It is our hope that Nova Scotia will continue to draw on the work that other provinces have done in developing its accessibility standards.

Comment on Bill 59

The legislation provides for the establishment of both an Accessibility Directorate and of an Accessibility Advisory Board. There is potential overlap in the mandates of these organizations.

Canadian Life and Health Insurance Association
79 Wellington St. West, Suite 2300
P.O. Box 99, TD South Tower
Toronto, Ontario M5K 1G8
416-777-2221 www.clhia.ca

Association canadienne des compagnies d'assurances de personnes
79, rue Wellington Ouest, bureau 2300
CP 99, TD South Tower
Toronto (Ontario) M5K 1G8
416-777-2221 www.accap.ca

For instance, one of the tasks of the Directorate is to "examine and review measures, policies practices and other requirements to improve opportunities for persons with disabilities", while one of the tasks of the Board is to "suggest measures, policies, practices and requirements that may be implemented by the Government to improve accessibility". We would recommend ensuring that the roles of the Accessibility Directorate and the Board are clearly delineated to avoid confusion.

Thank you again for considering our comments.

Yours sincerely,

"Ethan Kohn"

Ethan Kohn
Counsel