



VIA EMAIL: [engageaccessibility@gov.bc.ca](mailto:engageaccessibility@gov.bc.ca)

November 29, 2019

Mr. Shane Simpson  
Minister of Social Development and Poverty Reduction  
PO Box 9929 STN, Provincial Government  
Victoria, BC, V8W 9R2

Dear Minister Simpson,

**Re: British Columbia Framework for Accessibility Legislation**

The CLHIA is pleased to provide input into British Columbia's Framework for Accessibility Legislation discussion paper that will inform the development of legislation in BC for those facing accessibility barriers.

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 British Columbia. It protects about 3.5 million British Columbia residents and makes over \$10 billion a year in benefit payments to residents in British Columbia (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 \$80 billion invested in British Columbia's economy. A large majority of life and health insurance providers are licensed to operate in British Columbia, with two headquartered in the province.

The CLHIA has consistently urged provinces to align their accessibility legislation, where possible, in order to minimize conflicting standards for businesses operating across Canada. Our members take seriously their responsibilities in the area of accessibility, and some have already taken a national approach to training, despite the fact that many provinces have not yet introduced requirements.

We are very pleased that you envision a broad alignment between federal and provincial legislation, including a commitment to adopt or build on existing standards, policies and practices developed elsewhere in Canada.

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](http://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](http://www.accap.ca)



In your consultation, you also ask stakeholders for their views on the frequency of legislative reviews of the legislation and standards. We agree that periodic reviews are desirable to ensure that accessibility requirements remain current and flexible. We also agree that reviews which are too frequent may hinder substantive efforts to implement the legislation. Ontario, for example, which has the shortest review period of 3 years, has recently proposed enhancements to website accessibility requirements, which would supersede requirements that are still being phased in under the legislation, and that businesses are still in the process of implementing.

No matter what frequency is chosen for review, we urge British Columbia to continue to engage in dialogue and co-ordination with other provinces on accessibility legislation. We would encourage provinces to work in tandem both when developing and revising accessibility standards to ensure these are harmonized as much as possible across the country.

Our industry strongly supports the plan for developing accessibility legislation in British Columbia. As providers of financial goods and services and as major employers in the province, we welcome the opportunity to actively participate in the work ahead.

Yours sincerely,

“Ethan Kohn”

Ethan Kohn  
Senior Counsel