SUBMISSION TO THE

AUTOMOBILE INSURANCE REVIEW

PUBLIC UTILITIES BOARD

NEWFOUNDLAND LABRADOR

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INTRODUCTION

The Canadian Union of Public Employees Newfoundland Labrador (CUPE NL) welcomes the opportunity to participate in Phase II of the comprehensive review of the province's automobile insurance system that has been undertaken by the Public Utilities Board in Newfoundland Labrador in 2017-2018. The Automobile Insurance Review was prompted by a reported increase in the cost of insurance claims which has led to the consideration of various options for reducing these costs, such as setting monetary limits or establishing higher deductibles on claims.

CUPE NL represents 6,000 workers in health care, education, public housing, provincial libraries, municipalities, child care, and other sectors. CUPE NL was built by women and men determined to have a collective voice in their workplaces and in society as whole. CUPE NL is a strong and democratic union that is committed to improving the quality of life for workers in Newfoundland Labrador.

CUPE NL believes that the comprehensive review undertaken by the Public Utilities Board (PUB) and Service NL provides a valuable opportunity to explore the possibility of creating an improved automobile insurance system for the province. We support a publicly owned, non-profit system with fair non-discriminatory rates and high-quality coverage for all licensed drivers including private-passenger drivers, independent commercial owner-operators, and drivers for fleet companies (such as trucking, courier, and taxi companies). By implementing a public auto insurance plan, Newfoundland Labrador would become the fifth province in Canada to have a government-owned, government-operated system of automobile insurance.

Public auto insurance plans across Canada offer mandatory auto insurance coverage to all drivers in their provinces. British Columbia, Saskatchewan, Manitoba, and Quebec have enjoyed the benefits of public auto insurance for many decades under governments of various political stripes. Newfoundland Labrador would be in the enviable position of being able to learn from the ample experiences of other jurisdictions to design, cost, and implement a made-in-Newfoundland-Labrador, full-service system to meet the vehicle insurance needs of the people of our province.

This submission demonstrates that a public auto insurance plan makes good sense for Newfoundland and Labrador, economically and socially.

SUBMISSION HIGHLIGHTS

- Since drivers are required by legislation to purchase automobile insurance, it is different from other products sold by private providers in the open market. Private insurance companies have a captive market.
- Because governments require drivers to purchase automobile insurance, governments are responsible for ensuring that benefits are fairly delivered, at a reasonable cost.
- In 2016, drivers in Newfoundland Labrador paid approximately $434 million and received approximately $334 million in claims. The premiums exceeded disbursements for direct claims by almost $100 million. These funds are presumed to be used to by the private companies to cover operating costs, such as staff, offices, promotion, broker fees, and other expenses, including profit.
- 95% of the auto insurance services are provided by approximately 16 insurers. When common ownership among these companies is factored in, only four companies provide approximately 84% of the automobile insurance business. These four companies have a stranglehold on the insurance industry in Newfoundland Labrador.
- The head offices for most of these companies are located outside the province. The profits go directly to the companies' shareholders. The considerable business capital that is generated by insurance premiums is invested in projects with maximum profit capacity, and not in projects that would advance the interests of the people of Newfoundland Labrador. Most of the capital generated by the auto insurance sector does not stay in the province.
- Most Canadian jurisdictions require insurance coverage for Accident Benefits and Third-Party Liability. The sole exception is the province of Newfoundland Labrador. Accident benefits coverage is mandatory in every province except Newfoundland Labrador.
- Drivers who incur injuries as a result of motor vehicle accidents in which the other driver is at fault must sue the insurance companies of the at-fault drivers for financial recompense. This can result in legal fees and "dueling doctors' syndrome" where the insurance company's preferred doctor feels that treatment is unnecessary, despite the opinion of the driver's own doctor. The current situation is unfair and discriminatory to low-income people.
- Private insurance systems tend to be inefficient. Disputes can lead to a very high percentage of premiums being used to pay experts and lawyers and not going directly to injured persons. Business costs for private insurance systems include duplication, competitive marketing, and profits.
- Insurance premiums in Newfoundland Labrador are among the highest in the country. In the 2017 report titled *Fair Benefits Fairly Delivered*, Newfoundland Labrador was ranked 10th out of 13 jurisdictions in insurance premium rates.
- The provincial public insurers of British Columbia, Quebec, Manitoba, and Saskatchewan do not charge higher premiums than those of private insurers in other provinces. In fact, the public insurers tend to offer rates that are often lower than, or at least comparable to, the rates in other provinces with only private insurers.
- Ontario (which does not have public auto insurance) is the most expensive province in Canada with premiums more than twice as expensive as those in Quebec (which has a public insurance system).

- Public automobile insurance companies have attributed their ability to offer a good insurance product at lower premiums to the following factors:

  - The not-for-profit nature of their mandates (with the exception of British Columbia, following the 2010 amendment to the Insurance Corporation of British Columbia (ICBC)legislation);
  - Reduced administrative costs, due to greater efficiencies and economies of scale;
  - Lower marketing costs due to the monopoly status for mandatory insurance;
  - Reduced high-cost claims because of the effectiveness of road safety and driver improvement programs.
- Four provinces currently have public auto insurance programs: British Columbia, Quebec, Manitoba, and Saskatchewan. These programs have existed for decades under different governments of varying political stripes.
- Many who have closely studied public auto insurance systems across Canada believe that the failure of other provinces to implement public auto insurance is the direct result of pressure applied by the private insurance companies. For example, the governments of Ontario, Nova Scotia, New Brunswick, and Newfoundland Labrador, when presented with compelling evidence of the merits of public auto insurance, opted instead for less effective remedies. They chose to set caps on benefits, increase deductibles, introduce temporary rate freezes, eliminate discriminatory practices, and establish a protocol for approval of rate increases by the Public Utilities Boards. Any possible benefits from these measures proved to be temporary and inadequate. The measures lacked the necessary vision to implement meaningful change.
- The solution to the high cost of auto insurance is not in reduced benefits. Fair benefits must be taken as the starting point in any insurance system. The solution lies with developing a non-profit auto insurance system that operates under public scrutiny.

THE BUSINESS OF AUTOMOBILE INSURANCE

Automobile insurance is different from other products sold by private providers in the open market. It is mandatory for drivers in every province and territory in Canada to carry auto insurance. Driving without insurance is a very serious offence with severe penalties which can include heavy fines and suspension of a driver's licence. Private insurance companies have a captive market because drivers are required by legislation to purchase insurance.

The automobile insurance industry in Newfoundland Labrador appears to be a healthy and thriving business. The Superintendent of Insurance compiles data on the premiums and disbursements reported by automobile insurers operating in the province. A summary table of the information collected in the 2015 and 2016 Annual Reports is provided in Table 1.

Table 1: Direct & earned premiums and direct claims in Newfoundland Labrador for 2014-2016

Type of auto insurance	*Insurance premiums ($000's)*			*Insurance disbursements ($000's)*		
	2016	**2015**	**2014**	**2016**	**2015**	**2014**
Liability	263,279	254,806	244,663	210,818	235,024	231,858
Personal Accident	31,708	30,529	30,319	22,174	26,628	25,437
Other	138,864	132,549	123,655	101,782	97,894	83,811
TOTAL	**433,851**	**417,884**	**398,637**	**334,774**	**359,546**	**341,106**

Source: 2015 and 2016 Annual Reports of the Superintendent of Insurance, Tables V, Newfoundland Labrador

As Table 1 demonstrates, in 2016, premiums of $433,851,000 exceeded disbursements for direct claims of $334,774,000 by almost $100 million. The $100 million covers such operating expenses as staff, offices, promotion, and broker fees, plus profit. According to the Superintendent's 2016 Annual Report, 46 automobile insurers provided services to drivers in Newfoundland Labrador. The background information prepared by the PUB notes that 95 percent of these services are provided by approximately 16 insurers. The PUB further points out that: "When common ownership among companies is considered, there are four companies writing approximately 84% of the automobile insurance business." (NL Public Utilities Board, Automobile Insurance Review Background, September 13, 2017, page 2.) These four companies have a tight grip on the insurance industry in Newfoundland Labrador.

Profits from insurance companies go to the shareholders. The considerable capital that is generated by insurance premiums is invested to benefit the financial interests of shareholders. Not surprisingly, private insurance companies invest to maximum profits, not advance the interests of the people of Newfoundland Labrador.

The head offices of most insurance companies are located outside the province of Newfoundland Labrador. The profits and return on investments – which consists of capital generated by the drivers of this province – leave the province and go directly into the pockets of shareholders.

INSURANCE COVERAGE IN NEWFOUNDLAND LABRADOR

Each province and territory in Canada is responsible for determining the minimum level of auto insurance coverage that is mandatory for their jurisdiction. Most jurisdictions require coverage for Accident Benefits and Third-Party Liability. The sole exception is Newfoundland Labrador which does not require coverage for Accident Benefits. **Accident benefits coverage is mandatory in every province except Newfoundland Labrador**.

As a result, drivers who incur injuries as a result of motor vehicle accidents where the other driver is at fault must sue the insurance companies of the at-fault drivers for financial recompense. This can result in legal fees and "dueling doctors' syndrome" where the insurance company's preferred doctor feels that treatment is unnecessary, despite the opinion of the driver's own doctor. The current situation in Newfoundland Labrador is unfair and discriminatory to low-income people who do not have the resources to retain lawyers.

As in other parts of Canada, various factors are used to determine premium rates in Newfoundland Labrador. The primary factors are the client's driving record (including tickets and at-fault accidents), car usage, as well as the vehicle's value, make, and model.

In 2005, Newfoundland Labrador implemented a series of changes to the insurance system which eliminated the practice of denying coverage, or increasing rates, based on age, gender, and marital status. At that time, a deductible of $2,500 was also introduced on claims for pain and suffering.

All private-passenger vehicles driven in Newfoundland Labrador are required to be insured for a minimum of $200,000 Section A (Third Party Liability) and Section D (Uninsured Automobile Coverage). As described below, there are four types of automobile coverage in Newfoundland Labrador. Only Sections A and D are mandatory, while Sections B and C are optional.

Section A (Third Party Liability) is coverage that is mandated by law. To operate an automobile in Newfoundland Labrador, the car must be insured with a minimum of $200,000 of Third-Party Liability (Section A) coverage. Drivers, passengers, or pedestrians injured in a collision that was not their fault may seek compensation from the at-fault driver's Section A coverage.

Section B (Accident Benefits) is optional coverage. These benefits are available to the driver of the vehicle as well as passengers and pedestrians injured as a result of an accident, regardless of fault. Accident coverage pays for medical treatment, income replacement, and other benefits to help with recovery, as well as funeral expenses and survivor payments in situations where a death results from a collision. The insurer is required to provide these benefits to the policy holder regardless of who caused the collision. **Accident benefits coverage is mandatory in every province except Newfoundland and Labrador**.

Section C (Vehicle Damage) is optional coverage that insures the automobile for loss or damage to the vehicle itself regardless of fault. This is optional coverage. Most people who own newer model vehicles will carry Section C coverage.

Section D (Uninsured Automobile Coverage) is mandatory coverage that provides for payment for injuries and property damage sustained in an automobile accident that is caused by an uninsured vehicle. The maximum coverage available under Section D is $200,000.

COMPARISON OF AUTO INSURANCE PREMIUMS ACROSS CANADA

It is very difficult to compare insurance rates in one province with the rates in another province because the type of coverage varies:

1. Different jurisdictions use different insurance models. British Columbia, for example, uses a tort model which allows the right to sue, while Saskatchewan offers consumers a choice between no-fault and tort policies. Manitoba and Ontario use a no-fault model with the option to sue for economic damages in excess of no-fault benefits. Quebec uses a pure no-fault model with no option to sue.
2. Mandated minimum levels of coverage and benefits can vary even between provinces that use similar insurance models.
3. Coverage within a given category may differ between jurisdictions.
4. Demographics, weather, and driving conditions, which tend to affect accident frequency and cost of claims, differ between jurisdictions.

It is especially difficult to compare premiums in a no-fault system with premiums in a system where at-fault drivers may be held liable through the legal system. A recent published review of the Ontario auto insurance system explains it this way: "Simply put, a province may provide fewer no-fault benefits but allow more access for plaintiffs to sue at-fault drivers for additional benefits. The "no-fault" insurance premium may be low but the premium to defend policyholders against claims in the event they are at fault will be higher." (David Marshall, *Fair Benefits Fairly Delivered: A Review of the Auto Insurance System in Ontario,* April 2017, Page 26).

All provinces and territories in Canada have some form of no-fault insurance. Accident Benefits coverage is provided – either mandatorily or in the case of Newfoundland Labrador optionally – resulting in accident benefits that are paid to all collision victims. Some jurisdictions also allow the right to sue. The difference between jurisdictions is the degree to which tort (the right to sue) or no-fault (access to accident benefits) is emphasized. Quebec has a pure no-fault system that eliminates the right to sue but provides substantial accident benefits. Ontario has a "hybrid" system, which blends no-fault and tort. Saskatchewan and Manitoba have either pure or hybrid no-fault insurance systems. British Columbia, Alberta and the Atlantic provinces have tort-based systems.

Despite the challenges of comparisons, it is worthwhile to look at the 2017 Ontario report commissioned by the Minister of Finance, Fair Benefits Fairly Delivered: A Review of the Auto Insurance System in Ontario, which provides a comparison of current provincial auto insurance premiums for private-passenger vehicles in each province and territory.

Table 2: Average private-passenger automobile premiums in 2015

Rank	*Province*	*Average premium*
1	**Quebec ***	**$724**
2	Prince Edward Island	$755
3	New Brunswick	$763
4	**Saskatchewan ***	**$775**
5	Nova Scotia	$783
6	Yukon	$806
7	Nunavut	$968
8	Northwest Territories	$974
9	**Manitoba ***	**$1,001**
10	Newfoundland Labrador	$1,090
11	Alberta	$1,179
12	**British Columbia ***	**$1,316**
13	Ontario	$1,458

** Boldface indicates provincial public auto insurance plans.*

Based on information provided *in* Fair Benefits Fairly Delivered: A Review of the Auto Insurance System in Ontario, April 2017, p. 28.

The following broad-picture conclusions can be drawn when comparing the premiums of provinces with private vs public insurance systems:

- The provincial public insurers in British Columbia, Quebec, Manitoba, and Saskatchewan offer rates that are often lower than, or at the very least comparable to, the rates in other provinces with only private insurers.
- Ontario (without public insurance) is the most expensive province. Its premiums are more than twice as expensive as those in Quebec (which has a public insurance system).
- British Columbia – which provides Canada's only for-profit public auto insurance[1] – is more expensive than the not-for-profit public systems of other provinces.
- The insurance premiums in Newfoundland Labrador are among the highest in the country.

PUBLIC AUTO INSURANCE IN CANADA

Public auto insurance is available in four Canadian provinces: Saskatchewan, Manitoba, British Columbia, and Quebec. Crown corporations were established in these provinces to offer insurance coverage to meet the mandatory automobile insurance requirements of each respective province.

[1] In 2010, the enabling legislation for the Insurance Corporation of British Columbia (ICBC) was amended to permit the British Columbia government to compel ICBC to pay dividends into the provincial treasury.

CROWN CORPORATIONS
PROVINCIAL PUBLIC AUTO INSURANCE

Saskatchewan: Saskatchewan Government Insurance (SGI) is the oldest public auto insurer in Canada. It was created in 1945 by the CCF government (the NDP's predecessor party) under the leadership of Tommy Douglas. Created with a loan provided by the province, SGI successfully paid back the $12,000 seed money within its first year of business. SGI also offers insurance products to consumers in other provinces across Canada. SGI currently employs more than 2,000 people and works with a network of almost 500 independent insurance brokers and nearly 400 motor license issuers in Saskatchewan, as well as numerous brokers outside the province. Its head office is located in Regina.

Manitoba: Manitoba Public Insurance (MPI) was created in 1971 by an NDP government under Edward Schreyer. It is a non-profit Crown corporation that operates on a pure no-fault model. Public insurance was introduced to Manitoba after extensive public hearings that found the existing private system to be expensive, inadequate and confusing. In addition to its auto insurance products which include mandatory insurance coverage (offered only by MPI) and extended coverage (offered in competition with the private sector), MPI offers driver and vehicle licensing services. MPI currently employs about 1,750 people. Its head office is located in Winnipeg.

British Columbia: The Insurance Corporation of British Columbia (ICBC) was created in 1973 by the NDP government of Premier Dave Barrett, following the release of a Royal Commission report which concluded that there was no effective competition in prices. While initially opposed by the opposition Social Credit Party, ICBC became popular with the public and its continued existence has been supported by subsequent governments. ICBC initially held a monopoly on all auto insurance products. In 1977 the private sector was given access to the optional insurance market, although ICBC continues to hold the lead in sales of non-compulsory coverage. ICBC currently employs 5,200 people. Its head office is located in North Vancouver.

Quebec: The auto insurance system in Quebec, La Société de l'assurance automobile du Québec (SAAQ), was introduced in 1978 by the Parti Québécois government of René Lévesque. The Quebec system is notable in that public auto insurance is limited to coverage of personal injuries while damage to property is covered by private insurers. SAAQ currently employs 3,400 people. Its head office is located in Quebec City.

Public automobile insurance companies have attributed their ability to offer a good insurance product at lower premiums to the following factors:

- The not-for-profit nature of their mandates; (ICBC became the exception following the 2010 amendment to its legislation).
- Reduced administrative costs due to greater efficiencies and economies of scale.
- Lower marketing costs due to the monopoly status for mandatory insurance coverage.
- Reduced high-cost claims because of the effectiveness of their road safety and driver improvement programs.

While premium rates are important when considering the value of public insurance systems, there are other factors that contribute to the effectiveness of insurance plans, including the quality of the insurance product, reliability of service, capacity of the capital to remain within the province, etc.

The four public auto insurance plans vary from province to province, but they share many commonalities, including:

- All are Crown corporations with similar core values.
- They are the sole providers of the mandatory automobile insurance plans within their respective provinces.
- They are responsible for driver licensing and vehicle registration and play a leading role in educational programs around road safety and driver improvement.
- They provide the mandatory insurance coverage and mandatory minimum amount for all vehicles registered by residents with valid driver's licences in their respective province.
- Because public insurance companies are required to insure all legal drivers in their respective provinces, they use the driving record of the individual and not that of his or her peer group to calculate individual premium levels.
- All drivers in Manitoba and Quebec are required to purchase public automobile insurance as part of their annual driver's licence fee.
- Rate increases in Saskatchewan, Manitoba and British Columbia must be approved by public regulators.
- In Quebec, the base rate for mandatory public auto insurance is set out in provincial statute.
- Brokers provide the main point of contact for consumers looking to purchase auto insurance in their local communities.

While there are many commonalities, there are also differences among the public insurance plans of each province, including:

- Public auto insurers in Canada have historically operated on a not-for-profit basis. The recent exception is ICBC whose legislation was amended in 2010 permitting the provincial government to compel ICBC to pay dividends into the provincial treasury. ICBC is the only for-profit public auto insurance provider in Canada.

- British Columbia is the only province with a public auto insurance program that operates solely within a tort-based system.
- Manitoba's system operates on a pure no-fault model.
- Saskatchewan is the only province that offers motorists a choice between no-fault and tort systems of insurance. With the introduction of "tort option" coverage in 2003, SGI coverage offered an opportunity for claimants who selected the tort option to go through the courts to sue for non-pecuniary damages, i.e. pain and suffering.
- In the Quebec system, public auto insurance is limited to coverage of personal injuries while damage to property is covered by private insurers.
- Each provincial public auto insurance system offers special products that have evolved over time to meet the needs of their respective clients.

OTHER PROVINCES

Governments of various political stripes have raise the possibility of establishing public auto insurance systems in four provinces - Ontario, Nova Scotia, New Brunswick, and Newfoundland Labrador.

Consideration of Public Auto Insurance in Other Provinces

Ontario: The Ontario NDP won the 1990 provincial election on a platform that included public auto insurance. After assuming office, Premier Bob Rae succumbed to pressure from business groups, and the policy was subsequently dropped in 1991.

Nova Scotia: Public auto insurance was an issue in Nova Scotia during the 2003 provincial election. It remained NDP policy when it formed the official opposition and during the 2006 election campaign. It did not appear in the NDP platform in the 2009 campaign and was not introduced when the NDP formed a majority government 2009-2013.

New Brunswick: In 2003, strong consideration was given to developing a public auto insurance for New Brunswick after private insurance rates nearly doubled. A Select Committee on Public Automobile Insurance was formed by the Legislative Assembly in New Brunswick in August 2003, chaired by Elizabeth Weir, NDP leader. The Committee was tasked with identifying a suitable model for public automobile insurance in order to ensure fair, accessible, and affordable insurance for all New Brunswickers. The Committee produced a 125-page detailed report which outlined the key elements of a made-in-New Brunswick model. Ultimately the Progressive Conservative government under Premier Bernard Lord, facing pressure from the private insurance lobby, rejected the model.

Newfoundland Labrador: The Progressive Conservative government of Premier Danny Williams considered public auto insurance in 2004, when private insurance firms threatened to pull out of the province in response to legislation rolling back premiums.

Experts who have studied public auto insurance systems across Canada believe the reason these four provinces did not implement public auto insurance was because of lobbying by the private insurance companies. The governments of Ontario, Nova Scotia, New Brunswick, and Newfoundland Labrador, chose instead to tinker with the existing system by setting caps on benefits, increased deductibles, introducing temporary rate freezes, and eliminating discriminatory practices. Clearly, these temporary fixes have not resolved the problem in Newfoundland Labrador.

CONCLUSION

CUPE NL urges the Public Utilities Board to use the valuable opportunity provided by the comprehensive automobile insurance review to recommend that the Government of Newfoundland Labrador form a Task Force to develop a publicly owned, made-in Newfoundland Labrador, full-service, non-profit automobile insurance model. The Task Force's responsibilities will be to identify the key elements of the proposed model, start-up costs, and implementation time-line. The model will outline a comprehensive no-fault plan to provide all licensed drivers in the province – including private-passenger drivers, independent commercial owner-operators, and fleet company drivers – with access to mandatory automobile insurance coverage at fair, non-discriminatory rates.

In creating a made-in Newfoundland Labrador public automobile insurance model, the Task Force can draw on the experiences of British Columbia, Quebec, Manitoba, and Saskatchewan, as well as the exploratory research undertaken by New Brunswick, Nova Scotia, and Ontario. CUPE recommends that a non-profit Crown corporation be created to operate at arm's length from the provincial government and to utilize independent brokers. The Crown corporation's mandate should include the provision of vehicle registration, driver's licensing, and mandatory auto insurance.

The public auto insurance system created in Newfoundland Labrador is expected to be financially self-sustaining and to operate on a break-even basis calculated over time. Beyond an initial start-up loan to be paid back in a timely manner, the Crown corporation will not receive money from, nor pay dividends to, the government.

In its corporate values and operating practices, the auto insurance model should reflect Newfoundland Labrador's commitment to independence, fairness, and prosperity for all.

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Public Utilities Board, Newfoundland Labrador

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