



Canadian Life & Health  
Insurance Association  
Association canadienne des  
compagnies d'assurances  
de personnes

December 2, 2025

The Honourable Jean-Claude D'Amours  
Minister of Intergovernmental Affairs  
Chancery Place  
675 King Street  
Fredericton, New Brunswick  
E3B 1E9, Canada

Sent via email: [PSLO-POLS@gnb.ca](mailto:PSLO-POLS@gnb.ca)

**Re: Free Trade Within Canada Act**

Dear Minister,

The Canadian Life and Health Insurance Association (CLHIA) is a voluntary association whose member companies account for 99 percent of Canada's life and health insurance business. These insurers provide a wide range of financial security products including life insurance, annuities and employ over 180,000 Canadians.

We understand that the New Brunswick government recently introduced the *Free Trade Within Canada Act*, which would remove interprovincial trade barriers and promote economic growth. Given the current economic and competitive pressures Canada is facing, the life and health insurance industry is supportive of the government's efforts to reduce interprovincial barriers.

We also understand that the legislation includes the recognition of goods and sellers, meaning if the seller of the good or service is entitled to receive certification if the seller holds comparable certifications issued in another Canadian jurisdiction. We strongly encourage the province consider licensed insurance agents as part of this initiative.

Licensing requirements for life and health insurance agents vary by province, but the obligations and qualifications of a licensee are the same in spirit. For an insurance agent to sell insurance in multiple Canadian provinces, the agent needs to obtain a license in each province they wish to operate in.

This creates significant administrative burden for regulators, insurance agents, agencies and insurance carriers. The increased cost, unnecessary license applications and administrative burden can prevent agents from doing business in multiple provinces, limiting competition and consumer access and choice.

A framework for mutual recognition can also benefit consumers by providing easier access to advisors across provinces and continuity of service when consumers move between provinces.

### **Harmonization of Licensing Requirements**

While the introduction of the *Free Trade within Canada Act* is a good first step, more can be done to reduce interprovincial barriers and ensure that Canada's regulatory landscape enhances Canada's competitiveness and productivity.

While there are some jurisdictional differences in licensing requirements across provinces, the obligations and qualifications of a licensee are essentially the same in spirit. Having consistent rules across provinces would promote greater consistency in the rules across Canada and quality of advice consumers get from advisors. Consideration should be given to a harmonized approach for insurance advisor licensing requirements across jurisdictions.

### **Conclusion**

We welcome the opportunity for continued collaboration and would be pleased to further discuss how our industry can support in reducing interprovincial trade barriers.

Yours sincerely,

Sarah Hobbs  
Vice-President, Policy  
Canadian Life & Health Insurance Association