



June 4, 2020

Email: [fin.cews-succ.fin@canada.ca](mailto:fin.cews-succ.fin@canada.ca)

***Re: Canada Emergency Wage Subsidy Consultation***

To Whom It May Concern,

I am writing to share the views of the life and health insurance industry in Canada on the federal government's Canada Emergency Wage Subsidy (CEWS) program.

The Canadian Life and Health Insurance Association (CLHIA) is a voluntary association whose member companies account for 99 per cent of Canada's life and health insurance business. The industry, which provides employment to over 156,000 Canadians and has more than \$850 billion of assets in Canada, protects nearly 29 million Canadians through products such as life insurance, annuities, registered retirement savings plans, disability insurance and supplementary health plans. It pays benefits of \$98 billion a year to Canadians and manages over 85 per cent of pension plans offered by small businesses.

I would first like to congratulate the federal government on the work that it has done and in collaboration with provinces and territories to put measures in place to protect and support Canadians during COVID-19. Canada's life and health insurers have been proud to work with all levels of government to help protect Canadians through health benefit plans, travel insurance and other financial security products.

Canada's life and health insurers are supportive of the CEWS. We believe that this program is crucial to help sustain the employer and employee linkage through the unprecedented challenges presented by COVID-19. It is our view that this linkage will help keep employees safe, healthy and cope with the many challenges of the pandemic and speed the recovery of our economy.

As part of this, many employees rely on these linkages to have access to workplace benefits. For many workers and employers, these benefits are essential to providing Canadians and their families with access to needed health services, such as prescription drug coverage and other health supports. We would encourage the federal government to maintain the ability to use the CEWS subsidy to protect both the wages and benefits of employees so they can continue to depend on these health supports during what remains, at its core, a health crisis.

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There continues to be number of questions and uncertainty over the eligibility criteria for the CEWS amongst some of our members. More clarity and useful FAQs on how eligibility criteria is to be applied to financial institutions would be helpful. Especially, given that revenue for any given period for our members also includes impacts of changes of their investment portfolio, which is an essential part of their normal operating activities. This would continue to become more crucial if an economic downturn persists.

Thank you for your consideration of the views of the life and health insurance industry. We will continue to work closely with you and your officials to offer assistance to Canadians. Should you have any questions, please feel free to reach out to me directly or to Susan Murray, Vice-President Government Relations at [smurray@clhia.ca](mailto:smurray@clhia.ca) or 613-691-6002.

Yours sincerely,

Stephen Frank  
President and CEO, CLHIA