



FAIR Association of Victims for Accident Insurance Reform

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FAIR submission to FSRA proposed Strategic Framework, and 2026-2027 Statement of Priorities ID 2025-010

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FAIR (Fair Association of Victims for Accident Insurance Reform) is a grassroots not-for-profit organization of injured car crash survivors and their supporters. We are the end-users of the auto insurance product and we rely on the Regulator to ensure the insurance product has value and that coverage, as promised by Ontario insurers, is available to us at a vulnerable point in our lives.

In this document FSRA clearly identifies that they must provide stability and build trust as a regulator. But the idea or prioritization of implementing “improvements to stakeholder and consumer experiences, such as enhancements to accessibility and digital-first communications” misses the need to ensure the quality of Ontario’s auto insurance. People need to know that a contract with an insurer means they have benefits they can count on, and that the Regulator is taking an interest in whether consumers are getting what they paid for.

FSRA’s statutory objects under **3 (1) (b)** to contribute to public confidence in the regulated sectors and **(f)** to promote transparency and disclosure of information by the regulated sectors appear to not be in the scope of the FSRA’s intent as expressed in this statement. There remains a decided slant to promote the interests of insurers over the needs of consumers. **3 (1) (g)** to deter deceptive or fraudulent conduct, practices and activities by the regulated sectors can only be achieved through deeper insurer transparency and through FSRA sharing that data regarding the types of complaints consumers are bringing to the Regulator and the outcome of those complaints with the public. Consumers have a legitimate interest in insurer behavior regarding insurer claims denials and outcomes. How can a consumer possibly competently choose an insurer or have confidence in the auto insurance sector without such knowledge? How can a Regulator oversee an industry without such knowledge being gathered and considered and if FSRA is gathering this information – why isn’t it being shared with the public?



The interest of insurers definitely takes priority in this proposal and we have yet to see what FSRA has gleaned from the Licence Appeal Tribunal (LAT) data that the Auditor General recommended be examined by FSRA as a tool to protect the public interest. The 2022 AG report "found that although FSRA receives this information from the LAT quarterly, it does little with it to better understand the types of cases that are appearing before the LAT, and if regulatory changes or other actions would reduce the number of LAT hearings on automobile insurance matters." Has that issue been addressed, and if so, where is that data so consumers can access it? Isn't that the sort of transparency consumers really need?

Where is the oversight for Insurer Medical Examination (IME) clinics that fail to provide quality medical opinion evidence? Where is the accountability for American companies who own those clinics that routinely and predictably deny claims through their providers who are only regulated by their Ontario Colleges who continue to fail Ontario patients/claimants? This failure to regulate is undermining the confidence FSRA purports to prioritize.

There does not appear to be genuine interest or intent to protect consumers in the document and that is truly concerning given the auto insurance reforms coming into force in July 2026. More than ever, consumers need the Regulator to put their interests before insurer profits. It is not enough to inform the public about optional benefits to avert what is likely an insurance crisis point and chaos for consumers. As long as insurers' behavior and claims handling practices remain cloaked in mystery, consumers will remain at risk of buying sham coverage. We think Ontarians deserve better than this document proposes to deliver.

Thank you for the opportunity to express our concerns about FSRA direction and priorities in the coming years.

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