

ness without having a license and there is no statutory provision whereby a license can be issued to us.

Even if as to Canada we do not require a license we still require one for carrying on business in Ontario because under the Ontario Insurance Act we are classified and can only obtain registration as Dominion licensees and, therefore, if we cannot obtain a license from the Dominion Insurance Department we cannot do business in Ontario.

It is submitted with great respect that provision should be made for continuing the present license to Dominion friendly societies.

If the order is treated as being included in the Act as an assessment company (and there seems to be no other provision of the Bill under which the order can be licensed) then it would appear that the order is only exempted from the necessity for maintaining a reserve and is not exempted from other provisions of the Insurance Act relating to assessment companies. As for instance:—

(a) The Act requires a deposit of \$50,000 (section 14 and 125).

(b) The expenses are to come from loading only. (Section 53).

(c) The policy must set out the whole contract. (Section 85). And no provision is made for changes in bylaws.

Then the license to an assessment company is in absolute discretion of the minister by section 116, whereas ordinary life companies are entitled to a license.

And returns by assessment companies may differ from the returns by the ordinary life companies. (Section 117).

As we are not required to maintain a reserve the form of returns may show that the Assessment Companies are in an inferior position.

If we as a Friendly Society are included as an Assessment Company we object to the provision in the Act that no new Assessment Companies shall be licensed because that would exclude other Friendly Societies. This clause throws an undeserved stigma upon the Friendly Societies method of insurance, and stamps it as being a method unworthy to be perpetuated although millions of people have felt the benefit of Assessment Insurance and although at the present time the Assessment Fraternities are stronger and better and more capable than ever before.

Section 192 of the Bill would seem to cut out some of the clauses of our Act of Incorporation (as amended) whereby references are made to the provisions of the Insurance Act and it is respectfully submitted that the section should be amended so as to avoid interference with private Acts.

The fact that we are not required to maintain a reserve renders the provisions of Section 36 and 42 inapplicable.

And as our insurance premiums or assessment are never loaded for expenses the provisions of Section 53 literally taken would prevent our carrying on business.

The constitution of a Fraternal Society renders it impossible that they should be governed by provisions of Section 86 since the subordinate officers are not appointed by the central authority.

It is respectfully submitted on the part of the Order that Fraternal Associations should be separately provided for and that the clause of the Act excluding them from the provisions of the Act should refer to them by name or otherwise identify them since there are so few now subject to Dominion Jurisdiction and that adequate provision should be made for the continuance of the license to these Fraternal Associations until other or further legislation should be introduced regarding them. All of which is respectfully submitted by The Canadian Order of the Woodmen of the World.

(Signed) C. C. HODGINS,

*H.C.C.*

W. S. HARRISON,

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