



September 27th, 2017

Financial Institutions Division
Financial Sector Policy Branch
Department of Finance Canada
James Michael Flaherty Building
90 Elgin Street
Ottawa, Ontario K1A 0G5

Attention Director

Email: finlegislativereview-examenlegislatif.fin@canada.ca

Regarding: "Potential Policy Measures to Support a Growing Economy: Positioning Canada's Financial Sector for the Future" (Second Stage Consultation on the Federal Sector Framework)
"Limitations on the Terms "Bank", "Banker", "Banking".

Dear Sirs,

Thank you for the opportunity to provide feedback through the consultation process on the issue of limitations on using the terms, "Bank", "Banker" and "Banking". As the representative of our organization please accept this letter as consent to the full disclosure of my comments. Beaumont Credit Union is community based, located in Beaumont, Alberta and has served the financial needs of the community for the past 71 years. Our Credit Union would be considered small with assets of \$230 million however we have 30 employees who service the financial needs of over 4500 Beaumont residents. We provide a full range of financial services to meet the needs of our personal and small business membership.

The last few years have been a struggle for many in our community as a large percentage of our members are either directly or indirectly involved in the oil and gas sector. Throughout this period our Credit Union has worked in partnership with our members to assist them through these tough times. We also recognize the need to support the community as a whole and in 2016 we contributed over 11% of our net income to the community and this does not include the countless hours of employee community volunteerism. Our contributions have continued in 2017 as has our resolve to assist our members and community during both economically challenging and prosperous times.



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Having spent my entire career in the financial services sector including Trust Companies, Banks and Credit Unions, it has been my experience that the terms “bank” and “banking” are used regardless of whether they deal with a bank or credit union. Examples include; requests from our existing members to open new bank accounts. Or when doing a loan for members, they want their bank account with Beaumont Credit Union to be debited for their monthly payment. While we are a Credit Union, we do provide banking services and while we do not want to be confused with the banks we do want to continue to use common language that Canadians understand in order to be competitive.

For our Credit Union there would be costs associated with making changes which would include signage, websites and logos. To put it in perspective we have conservatively estimated these costs at \$100,000.00. As a small business, this additional cost would put pressure on our ability to continue to fund community events as well as potentially have an impact on our employees.

It is our recommendation that the Department of Finance propose changes to the Bank Act that would allow credit unions, as prudently regulated deposit-taking institutions, to use the terms “bank” and “banking” to describe their activities and services.

Thank you for considering this submission and we welcome the opportunity to work with you.

Yours sincerely,

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