

To: Director

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

## Copperfin Credit Union Submission Consultation on the Review of the Federal Financial Sector Framework

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Copperfin Credit Union is pleased to participate in the Department of Finance's second stage consultation on its review of the federal financial sector framework.

Copperfin is the largest locally owned credit union in Northwestern Ontario; with \$384 million dollars in assets serving 18,000 members. We are a full service, 6 branch credit union serving 5 communities including two where we are the only financial institution. Later this fall we will be adding a 3<sup>rd</sup> Thunder Bay branch.

One of our niche markets is the small to medium businesses; we offer a great opportunity to be their financial service provider of choice by offering personalized service, convenience/ease of use, and leveraging our ability to make decisions locally as our key differentiator.

Moving Life Forward is a plan that mobilizes and provides focus on what Copperfin Credit Union sets out to do every day: help move the lives of our members and our communities forward.

Our submission focuses on the Department of Finance's consultation question about the Bank Act restrictions on the use of the terms "bank and banking" by non-banks and credit unions in particular

Banking is a verb, and our members use it to describe what they do with Copperfin. They engage in online "banking" with us. "Bank" and "Banking" are the common words our members use to describe how they interact with us. Our members are well aware that we are not a bank and understand the difference between a bank and a credit union. They are member owners and are proud that we are a co-operative financial services entity and that we give back to them in the form of dividends, economic development, and community investment.

We are committed to giving back to the communities in which they live and work, focusing on making impactful donations that support health care and social wellness for example:

In 2016 Copperfin gave back six times more to their community's than big banks for every dollar of business.

Our commitment for 2017 is to give back eight times more, here are a few notables:

• Dividends in excess of \$350,000 were returned to our members.

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- Donation of \$25,000 to Roots To Harvest, they are a member organization that support youth in recognizing their full potential, significantly improving our overall social wellness was made.
- Commitment to donate over two years \$50,000 to the Lake of the Woods District Hospital Foundation to help purchase a new CT Scanner.

Copperfin understands that Section 983(2) of the Bank Act restricts the use of the terms "bank", "banking" or "banker" by non-bank entities like credit unions. We also understand that the policy intent is to prevent people from being misled into thinking they are dealing with a bank. We don't understand the move from a common sense approach to a complete ban. Credit unions have used those terms with little incident for years because that is how Canadians use them.

Being forced to change the common sense language Canadians know and use every day would be costly and time consuming to our credit union and those across the country. Nor should we be forced to invent new words to replace the terms Canadians already use to describe their dealings with regulated institutions like credit unions. We believe that the Bank Act should be changed so that it is clear that credit unions, as regulated deposit-taking institutions, can use these terms to describe what they do.

We recommend the Department of Finance propose changes to the Bank Act that would allow credit unions, as prudentially regulated deposit-taking institutions, to use the terms "bank" and "banking" to describe their activities and services.

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

For more information, please contact:

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