

DECISION

**2025 NSRAB 17
M12110 and M12113**

NOVA SCOTIA REGULATORY AND APPEALS BOARD

IN THE MATTER OF THE INSURANCE ACT

- and -

IN THE MATTER OF APPLICATIONS by **AVIVA INSURANCE COMPANY OF CANADA**
and **TRADERS GENERAL INSURANCE COMPANY** for approval to maintain their rates
and risk-classification systems for miscellaneous vehicles

BEFORE: Jennifer L. Nicholson, CPA, CA, Member

APPLICANTS: **AVIVA INSURANCE COMPANY OF CANADA
TRADERS GENERAL INSURANCE COMPANY**

FINAL SUBMISSIONS: March 6, 2025

DECISION DATE: **April 29, 2025**

DECISION: **Applications are approved.**

I INTRODUCTION

[1] Aviva Insurance Company of Canada and Traders General Insurance Company applied to the Nova Scotia Regulatory and Appeals Board to maintain their rates and risk-classification systems for miscellaneous vehicles.

[2] The Board must consider whether the proposed rates and risk-classification systems are just and reasonable and in compliance with the *Insurance Act (Act)* and its *Regulations*. The Board is satisfied that Aviva and Traders' applications meet these requirements and approves the companies' proposals.

II ANALYSIS

[3] Aviva and Traders applied under the Board's *Rate Filing Requirements for Automobile Insurance – Section 155G Prior Approval - Minor (Rate Filing Requirements)*. Since the filing of these applications, Aviva and Traders received and responded to an Information Request (IR) from Board staff. Board staff prepared a report to the Board with recommendations on the applications (Staff Report). Before providing the Staff Report to the Board, Board staff shared it with Aviva and Traders. The companies reviewed the report and informed Board staff that they had no further comments.

Findings

Eligibility to Use Section 155G – Prior Approval – Minor

[4] To use the Board's *Section 155G – Prior Approval – Minor* filing requirements, the annual written premium (AWP) for a class of vehicle must be less than the threshold established by the Board. For miscellaneous vehicles, Board staff provided a table comparing the actual annual written premiums to the Board threshold, where

available. Based on this comparison, both Aviva and Traders are eligible to use these filing guidelines for all vehicle types included in the filing.

Analysis

[5] When a company proposes no change to rates or risk-classification systems under a Section 155G – Prior Approval – Minor application, the Board does not require the company to provide any support for the proposal if the company is eligible to use the requirements. Having proven the companies qualify for a minor filing, the Board does not require Aviva or Traders to provide support for the proposal for no change.

[6] Board staff compared the average premiums provided by Aviva and Traders to those published by the General Insurance Statistical Agency (GISA). The information suggests that the proposed premiums are in line with the industry.

[7] Board staff recommends the Board approve the proposal to leave rates and risk-classification systems unchanged for these miscellaneous vehicles for both Aviva and Traders. The Board agrees.

Automobile Insurance Manual Review

[8] A review of the existing manuals on file did not uncover any instances where the companies appeared to be in violation of the *Act* or its *Regulations*. Because nothing is changing, the Board does not require the companies to provide revised manuals.

Other Sections

[9] Board staff reviewed the remaining sections of the applications and found that they comply with the Board's Rate Filing Requirements.

[10] The financial information included provides comfort that the proposals for no changes under Section 155I(1)(c) of the *Act*, are unlikely to impair the solvency or financial well-being of either organization.

III SUMMARY

[11] The Board finds that the applications follow the *Act* and *Regulations*, as well as the *Rate Filing Requirements*.

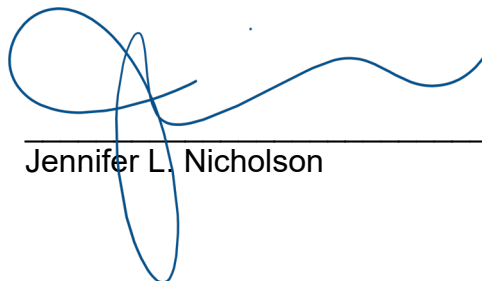
[12] The companies originally proposed an effective date of June 1, 2026, for new business and renewals. Because the proposal is for no change, an effective date is moot. Board staff, however, recommend an effective date of June 1, 2025, for new business and renewals, which is much closer to the date Aviva and Traders filed their applications. The Board agrees.

[13] The financial information supplied by Aviva and Traders satisfies the Board, under Section 155I(1)(c) of the *Act*, that the proposal to leave rates unchanged is unlikely to impair the solvency of the company.

[14] The applications qualify to set a new mandatory filing date under the *Mandatory Filing of Automobile Insurance Rates Regulations*. The new mandatory filing date for Aviva and Traders for miscellaneous vehicles is March 1, 2028.

[15] An order will issue accordingly.

DATED at Halifax, Nova Scotia, this 29th day of April 2025.



Jennifer L. Nicholson