

May 16, 2024

Rhiannon Wong Tech Safety Canada Project Manager Women's Shelters Canada Ottawa, ON K1P 5G4

Meseret Haileyesus Founder and Executive Director Canadian Center for Women's Empowerment Ottawa, ON K1N 9N5

Sent via email to: rwong@endvaw.ca, mesi.haileyesus@ccfwe.org

RE: An open letter to TD, Scotiabank, RBC, CIBC, BMO, Interac, Canadian Bankers Association

Dear Rhiannon Wong and Meseret Haileyesus,

Thank you for your letter dated May 7 on the important issue of Interac e-Transfers being used for intimate partner violence and abuse.

As President and CEO of the Canadian Bankers Association (CBA), I want to say unequivocally that Canada's banks stand firmly against intimate partner violence and any form of abusive behaviour. Protecting Canadians from intimate partner violence requires collaboration and commitment from many stakeholders including law enforcement, and the CBA and our members are committed to addressing this issue together.

Currently, as part of their individual banking agreements and policies, Canadian banks have the ability to withdraw or limit banking services from a customer who engages in such behaviour and do so when it is reported to their attention.

The CBA and its member banks have been exploring solutions to help further protect vulnerable customers, including how additional educational and policy tools could be used to combat financially abusive behaviour. We have also been reviewing how to combat abusive behaviour with available technical options that comply with local legal and privacy requirements.

We are reviewing international best practices to help inform our approach. However, any program for the Interac e-Transfer system in Canada will require a Canadian approach, as regulatory and platform requirements are unique in each jurisdiction. That said, we embrace the opportunity to learn from other stakeholders and jurisdictions.

In addition, the CBA and our member banks are working with Interac to assess solutions that will meaningfully address this issue and prevent the e-Transfer service from being misused in this way.

As we continue our work to address this important issue, the CBA, on behalf of its members, would like to meet with your respective teams to discuss how we can continue to implement strong controls against targeted abuse. We look forward to hearing from you at your convenience.

Thank you.

Anthony G. Ostler President and CEO

Canadian Bankers Association