

# Indigenous Insurance

Literature Review



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# *A REVIEW OF LITERATURE*

Indigenomics Institute

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## **Executive Summary**

CMHC focuses on offering support, autonomy, and control of Indigenous housing, by Indigenous peoples in collaboration with National Indigenous Organizations and Indigenous housing experts. CMHC has identified two primary barriers to advancing the autonomy and control of housing by Indigenous people. The first barrier is rising property insurance costs and the compounding elevated rates of construction, loan, and fire and flood insurance located on Indigenous territories. The second barrier is lending insurance as many First Nations lack the financial resources or credit history to acquire loans in the absence of a loan guarantee.

### **Objectives and Research Questions**

Building on literature published in the 1990s to 2000s (Wellman 2000; Wilkinson & Paiement 1999), this literature review examines the current body of knowledge on various issues related to Indigenous housing and in particular property insurance costs and acquiring lending insurance. The main objectives were to:

- outline insurance offered by Indigenous-controlled organizations, or those who have attempted to establish an insurance product in the past.
- provide a basis that contextualizes the current body of knowledge regarding insurance provision for Indigenous housing, and pay special attention to for-Indigenous, by-Indigenous initiatives that may exist locally, as well as insurance provision on Métis settlement or Inuit regions.
- acts as a starting point to facilitate further discussion and research into how to best develop options related to a risk assessment model and affordability model that responds to Indigenous worldviews and reflects the challenges of housing development on Indigenous territory.

This research also looks specifically at Indigenous-led initiatives that may exist locally, as well as insurance provision on Métis settlement or Inuit regions. This information can shed light on the types of local, small-scale solutions that are currently in place, identify the main insurance

providers, and explore the affordability of insurance for Indigenous housing. An important point to note is the gaps in knowledge related to insurance approaches and risk models, many of which are identified in this document.

The question that we specifically intended to answer which is grounded in an Indigenomics perspective is: How does relevant legislation (e.g., *First Nation Fiscal Management Act*, *First Nation Land Management Act* etc.) interact with insurance provision and housing assessments (including but not limited to land tenure complexity) as well as current insurance risk guidelines published by the Office of the Superintendent of Financial Institutions (OSFI) and other regulatory bodies?

An overview of the literature review is provided below based on seven key topic areas:

#### Indigenous Peoples, Lands and Housing

- This section provides background and context on Indigenous peoples in Canada with respect to where they live, the size of Indigenous communities and rural or urban locations. It is noted that all Indigenous communities have unique circumstances whether urban or rural and the diversity of cultures is extensive and varied. Within this section, the material reviewed considers how and in what ways various strategies and practices have impacted Indigenous housing in communities including changing risk management, land management legislation and the *Indian Act*.

#### Lending Programs and Financing Options

- This section looks at a review commissioned by the Canada Mortgage and Housing Corporation (CMHC) on the availability and affordability of residential real estate. The insurance company, Marsh (2021), surveyed and interviewed 36 insurers about their coverage, appetite, capacity, and challenges for commercial residential and personal homeowners' insurance. The Marsh report concludes that historical conditions created

unfavourable conditions for insurers and a market correction was necessary but created rising premiums, higher deductibles, and more restrictive terms and conditions.

#### Lending Guarantee, Construction Insurance and Property Insurance

- The review highlights one article of note, Pomeroy and Falvo (2013), that touches on role, structure, and funding in the delivery of housing. The authors commented that one notable policy shift was the change in respect to mortgage insurance policy, implemented late in 2006, which served to extend the maximum amortization on insured mortgages from 35 to 40 years. This section also highlights information on the current state of increased strata property insurance premium rates. Two critical themes with respect to insurance costs and availability are the uncertainty of climate change and the extent to which climate change threatens the insurers.

#### Disaster Insurance and Disaster Recovery Funds

- This section looks at the impacts of disasters from a community context and approaches to emergency management in Canada as a shared responsibility. Disasters impact Indigenous communities in ways that are different than other communities. There are various causes for these disproportionate impacts, including a community's relative remoteness, isolation in fire-prone areas (dense forests), and a lack of emergency services or technical capacity (Mihychuk 2018, 1). On many reserves, service agreements with Indigenous Services Canada and provinces or territories provide for oversight. However, this review notes that there are gaps in these arrangements and also that the costs from disasters have been increasing and will likely continue to increase in the face of climate change.
- Risk Assessment: This overview examines different kinds of risk models in the context of financial, climate change and even disasters in an ever-changing social world. Overall, a risk model can be described as an assessment tool that guides a process of evaluation to support lenders to mitigate and manage risk and for borrowers to gain awareness of different types of risk situations.

### Indigenous Initiatives

- The authors note that there are several examples of successful Indigenous initiatives within Canada where communities have improved their housing situations. For example, the British Columbia Nak'azdli First Nation signed, in 2008, a "First Trust Agreement Corporation (CMHC) On-Reserve Homeownership Loan Insurance Pilot product." This agreement aimed to support affordable housing that met existing needs. There are also several Indigenous owned-operated insurance companies that work directly with Indigenous communities and organizations.

### Case Studies

- Two case studies are provided in this section that focus on many of the causes for financial exclusion and a lack of access to financial institutions by Indigenous people. Buckland, McKay, and Reimer (2006) present two case studies of financial exclusion in Manitoba: one in the rural community of the Fisher River Cree Nation (FRCN), and the other in the inner-city of Winnipeg. The study found that some people are reluctant to use mainstream financial institutions because of poor treatment by staff, distrust and/or racism; but both financial access *and* literacy need to be improved, not one or the other. The study notes that the proximity or access to banking services, whether rural or urban locations, impacted peoples' use of mainstream or fringe services as did socio-economic well-being.

### **Conclusions and Moving Forward**

This review points to some key conclusions related to the availability of knowledge on this subject area, the need for more information on "for Indigenous and by Indigenous" initiatives and the existence of a relatively small number of local, small-scale solutions. In addition, there are many limitations and gaps in knowledge regarding insurance provision for Indigenous housing. This points to the need for further development of "Indigenous-specific" risk analysis

models outlining various options for geographic location and product (lending, construction, property).

Following the literature review the next step is to engage in an Indigenous-led engagement strategy to explore ways of what a “for-Indigenous and by-Indigenous” option could entail. The literature review has helped validate several important research questions to further consider the following:

1. How are risks to property assessed and is adequate consideration given to the risks facing Indigenous nations? How are deficiencies in risk information impacting the insurance offerings and premiums for Indigenous nations, corporations, and people.
2. How does elevated exposure and increased vulnerability to natural disasters affect the property insurance needs and access for Indigenous nations and homeowners, and what interplay exists between federal funding programs (e.g., housing, capital, emergency response and recovery programs) and take-up on property insurance. What are the premiums and deductibles and how is affordability calculated? What are the impacts and indirect/downstream costs of inaccessible property and casualty insurance, and who bares these impacts and costs?
3. What opportunities exist to expand and enhance coverage that is not currently available or affordable?
4. What barriers have some organizations faced when developing a for-Indigenous, by-Indigenous product?

## Section One: Introduction

The Canada Mortgage and Housing Corporation (CMHC) has committed to a National Housing Strategy (NHS) that was passed by Cabinet in 2017 and received Royal Assent in 2019. The NHS, aims to remove 530,000 families from housing need by focusing on the Canadians in vulnerable situations, in recognition that not all groups of people, and especially Indigenous peoples, have not had access to affordable, and safe housing. CMHC is working with national Indigenous organizations and Indigenous housing experts with the intention of offering support, autonomy and control of Indigenous housing, by Indigenous peoples. In support of CMHC's objectives, and in order to support the development of autonomy and control of Indigenous housing, CMHC has established a cross-functional working group to explore and recommend ways to facilitate access to affordable housing finance for Indigenous and Northern communities. The group has worked with external partners to examine the barriers that Indigenous groups face when accessing financing tools, including mortgages, lending, securitization, and recommend possible new policy approaches, tools, products, and initiatives. It is in this context that this literature review has been developed.

### **Objectives and Research Questions:**

Two main factors drive CMHC's interest in addressing these aspirations. First, rising property insurance costs and the compounding elevated rates of construction, loan, and fire and flood insurance located on Indigenous territories. Second, lending insurance remains a key barrier to accessing financing for Indigenous projects, as many First Nation governments lack the balance sheet or credit history to support loans in the absence of a loan guarantee, ministerial or otherwise (council, First Nation Market Housing Fund, etc.). Many risk assessments that underpin insurance requirements are homogenously calculated and applied across Canada without consideration of Indigenous territory. These issues constitute a key barrier to access for financing and the delivery of housing on Indigenous territory.

To respond to these gaps in knowledge by way of programs and policies specific to Indigenous funding, this literature review provides a reflection of the current body of knowledge on various issues related to Indigenous housing and has the following main objectives:

1. outline insurance offered by Indigenous-controlled organizations, or those who have attempted to establish an insurance product in the past.
2. provide a basis that contextualizes the current body of knowledge regarding insurance provision for Indigenous housing, and pay special attention to for-Indigenous, by-Indigenous initiatives that may exist locally, as well as insurance provision on Métis settlement or Inuit regions
3. acts as a starting point to facilitate further discussion and research into how to best develop options related to a risk assessment model and affordability model that responds to Indigenous worldviews and reflects the challenges of housing development on Indigenous territory

Building on early literature published in the 1990s to 2000s (Wellman 2000; Wilkinson & Paiement 1999), the particular focus of this literature review is to provide a basis that contextualizes the current body of knowledge regarding insurance provision for Indigenous housing and pay special attention to Indigenous-led initiatives that may exist locally, as well as insurance provision on Métis settlement or Inuit regions. In doing so, the information provided can provide additional insight regarding what local, small-scale solutions are currently in place, who the main insurance providers are, and the affordability of insurance for Indigenous housing.

There are certainly gaps in knowledge when it comes to insurance approaches and risk models in the context of Indigenous peoples, many of which are identified later in this document. We have outlined several research questions to guide our approach to this review. In doing so, our intention is to outline an updated assessment from an Indigenous worldview which addresses how housing and its associated areas (e.g., loans, mortgages, lending, etc.), is different for-

Indigenous, by-Indigenous insurance providers (including self-insurance, local, and national) assess lending, construction, and disaster risk on reserve, in modern treaty territory, and on settlement lands. In particular, Indigenomics is a worldview that calls for a new model of development, one that advances Indigenous self-determination, collective well-being, and reconciliation; it focuses on the power and strength of Indigenous peoples, not deficits. The question that we specifically intended to answer grounded in an Indigenomics worldview includes the following:

Q1. How does relevant legislation (e.g., *First Nation Fiscal Management Act*, *First Nation Land Management Act* etc.) interact with insurance provision and housing assessments (including but not limited to land tenure complexity) as well as current insurance risk guidelines published by the Office of the Superintendent of Financial Institutions (OSFI) and other regulatory bodies?

In the following sections we detail a review of current housing resiliency guidelines, as well as “for-Indigenous by-Indigenous” solutions locally available and developed in collaboration with Indigenous organizations (like, for example, [the Aboriginal Disaster Resiliency Guidelines](#)) that have had an impact on construction and property insurance affordability. In doing so, we provide case studies that illustrate ‘for-Indigenous/ by-Indigenous’ models or other successful models that are locally found, innovative, and progressive. In addition, we offer a section that focuses on the development of risk analysis models outlining various options for geographic location and product (lending, construction, property) and we identify gaps in the literature which can service to help guide additional and innovative areas of further research and expansion.

## Section Two: Indigenous Peoples, Lands and Housing

The majority of Indigenous Peoples in Canada live in predominantly rural areas, although the percentage varies across provinces and territories. According to the Assembly of First Nations, there are 634 First Nations communities in Canada. According to the 2016 Census of Canada, about 40% of “Registered Indians” live on reserve, 14% live in rural areas (off reserve), and 45% live in urban areas (population greater than 1,000) (ISC 2020). Seventy percent of First Nations reserve communities have less than 500 inhabitants, while only 4 percent have more than 2,000 inhabitants. These communities can be relatively urban or extremely remote and thus have unique circumstances. “Non-Status Indians” account for 14% of the Indigenous population, and about 76% live in urban areas (ISC 2020). The majority of Inuit live in Inuit Nunangat ("the homeland") which represents a third of Canada's land mass and half the coastline. Inuit Nunangat comprises 51 communities across four regions: Inuvialuit Settlement Region (Northwest Territories and Yukon), Nunavut, Nunavik (northern Quebec), and Nunatsiavut (Labrador) (ISC 2020). Alberta has eight Métis Settlements with about 5,000 residents; these settlements are - the only “government-recognized” Métis land base in Canada (Government of Alberta n.d.).

In this section we outline Indigenous organizations for Indigenous people in need of housing and support services. Understanding how Indigenous peoples’ housing needs within Traditional Territories has been informed by various strategies is critically important. From an Indigenomics perspective, this understanding advances the conversation of Indigenous worldviews which centres Indigenous ways of knowing regarding relationships to land, territory, and money. More often than not, these issues are contextualized in a Poverty Reduction Strategy, Expert Advisory Panel on Homelessness, a Long-term Affordable Housing Strategy, and even a Comprehensive and Mental Health Addictions Strategy. We provide an overview of the elements of various program operations including program timelines, activities, payments, operating funding, capital projects and funding, program requirements and reporting, roles and responsibilities and the client application process.

## Relevant Regulations

The Office of the Superintendent of Financial Institutions (OSFI) provides oversight of the property and casualty insurance industry in Canada. While OSFI does not provide oversight for any Indigenous-controlled or Indigenous-focused property and casualty (P&C) insurance providers, it does provide oversight for 146 federally regulated P&C providers. These providers underwrite most of the products and policies that are offered by Indigenous insurance brokers in Canada. In January 2022, OSFI announced its plans to release draft guideline on climate risk management for federally regulated financial institutions (FRFIs), for consultation. OSFI notes that its main objective with this initiative “is to support FRFIs in their efforts to build awareness and capability in managing climate-related financial risks.” This consultation represents an opportunity to consider the risks and context specific to Indigenous territories and people. Preliminarily, OSFI has identified 6 areas of focus for these guidelines, including: climate data and analytics; scenario analysis for climate-related financial risks; climate-related capital and liquidity considerations; climate-related financial disclosures; stakeholder engagement; and expanding OSFI’s own capability. A review of OSFI’s guidelines and published materials indicate that it places little focus on Indigenous-specific concerns and risks in its guidelines and oversight activities. Further analysis of the potential role of OSFI and OSFI guidelines in addressing the concerns, risks and needs of Indigenous peoples is warranted. Additionally, the absence of Indigenous P&C providers in Canada highlights a significant gap in the market.

The First Nations Land Management Act (FNMLA) allows First Nations to “develop their own laws about land use, the environment and natural resources and take advantage of cultural and economic development opportunities with their new land management authorities” ([ISC n.d.](#)). While the Act offers First Nations greater control and authority over land, it also voids the fiduciary responsibility of the federal government to First Nations (the regimes are extremely costly) and opens up lands to market interests (Jobin & Riddle 2019:7). Jobin and Riddle (2019) summarize some of the debates and issues related to the FNMLA and how the land management regime differs on treaty and non-treaty territories in terms of concerns about overwriting treaty history and obligations. The authors, writing for the Yellowhead institute,

conduct a critical analysis of the land regime and note that it pushes First Nations towards neoliberal economic development, opens up First Nations' lands to the market, does not affect Indigenous lands beyond reserves, and reinforces colonial governance that cannot account for Indigenous legal orders. In terms of gaps of knowledge in this space, the authors state that "there are currently no studies that prove whether the First Nations Land Management Regime has reduced poverty on reserve or whether increased overall wealth of those First Nations has contributed to better socio-economic indicators, such as health, language renewal, or cultural revitalization (Jobin & Riddle 2019: 6). As the federal government uses the Land regime as a key element in the shift to sectoral self-governance, First Nations communities must be attentive to the broader context and consider alienation from the traditional territories through market forces and colonial policies.

Colonial tools of government disrupted Indigenous relationships to land. Through the *Indian Act* some reserve land (legal title with the Crown) is held in trust by the band for the benefit of community members. The *Act* also has provisions for other forms of land tenure that grant private property rights over land, *lawful possessions*, and arrangements whereby the band leases out land. In all cases, however, the colonial understanding of individual property rights as a prerequisite for reducing poverty and improving standards of living is absent on reserve land (Aragon & Kessler 2018:2). In a study examining the relationship between property rights and economic effects on First Nations lands Aragón and Kessler (2018) find that property rights have limited effects particularly on incomes and employment, and where a relationship does it exist, it is because of an inflow of a non-Indigenous population. First Nations communities are unique, however, and the findings apply to communities that are actively using private tenure regimes on their land.

### **Indigenous Territories (on/off reserve and Urban Spaces), Land Claims and Insurance**

Historically, Land tenure in reserve communities has been governed by non-Indigenous governments for centuries and, traditional roots and non-Indigenous institutions have

therefore become inextricably intertwined (Baxter & Trebilock 2009). One of the outcomes of this governing relationships is that today, First Nations may find that current reserve tenures are mismatched to their own traditions, or to tenure off reserve, or both. In fact, First Nations' land tenures on and off reserves are subject to multiple layers of oversight and to rapidly shifting common law interpretations of Aboriginal title. There are more than 600 First Nations in Canada and approximately 3,000 reserves many with their own unique tenure arrangements and goals for economic development. Consequently, land tenure systems can be based on diverging and competing traditions and customs of vary diverse First Nations communities.

On reserves, few people own their home (Alcantara 2005). Sections 28 and 89 of the Indian Act prevent lending institutions from seizing assets and property in the event of a default, thus deterring third parties from lending without the power to seize properties. As a result, according to Alcantara, most First Nations people on reserve find it difficult to obtain a mortgage, thus renting or leasing their house from the band. Alcantara explores the misconception that land on Canadian First Nations reserves is only owned by the band. Instead, he argues, there are four types of private property regimes: customary rights, rights gained under the *First Nations Land Management Act*, leases, and certificates of possession. Alcantara looks specifically into Certificates of Possession and how they can ameliorate some of the chronic housing conditions on reserve.

According to a 2022 review of literature, on-reserve communities have limited access to insurance because most insurers are not comfortable with the fire protection, building standards and community security for on-reserve buildings (Golnaraghi et al, 2020). One of the major issues in this regard is that flood coverage is not available in some locations due to the expected frequency of flooding events predicted by flood risk mapping models. On the other hand, even when flood insurance is available, it is often not purchased because the policyholder cannot afford the premium (Golnaraghi et al, 2020). That being said, if flood insurance is purchased, the limitations in the coverage may result in a shortfall of funds needed to recover from flooding. In the North which includes Yukon, Northwest Territories and Nunavut, in

addition to these issues there are also barriers to housing stock and construction. According Saaed (2018), these include the high costs of construction and materials; land use and supply and challenges appraising land value; housing monopolies in which a single private landlord owns and manages much of the housing; greater financial risk; inconsistent funding and regulations; and limited financial capital (Saaed 2011:22-27).

An Indigenous-focused study conducted in Queensland, Australia provides a relevant example of a case study of an appropriate model for home ownership on community title land that respects community heritage, rights, and identity of local Indigenous groups (Moran et al. 2002). The household survey contained 43 quantitative and qualitative questions, took place in four remote communities with 75 people interested in home ownership or in the survey. There were four topics addressed in the survey: (1) how people understand home ownership, (2) if people seek security of the house or the land underneath, (3) if people want to pass their houses onto their kids, and (4) commitment to home ownership after explaining the limitations (p.359). The authors report that there was a diversity of perceptions of home ownership across the four communities: in two communities there was a strong interest and good understanding of the pros and cons and in the other two communities there was less interest and a much more complicated and complex understanding about home ownership – which were often intertwined with traditional practices (Moran et al 2002, p.361).

People in all four communities had informal claims on home ownership, particularly on the home in which they were currently residing. The housing markets in these communities is closed: “All of the discrete Indigenous settlements in Queensland are located on communal title land held in trust by either the Community Council or an incorporated land trust. Unlike the mainstream Australian property market, the tenure is not alienable which creates effectively a closed housing market” (p.362). For most, this was not an issue because they intended to pass their house down to their family (75% indicated this was very important); but for some, this was dissatisfying because they felt as if they would not recover what they paid for the house. In terms of separating land tenure from home ownership, in order to not alienate land, the

majority of respondents rejected this. The authors propose a distinction for consideration of control over ownership – which might be more acceptable in terms of separating tenure so land can be held by the community/council. The article represents respondents understanding of home ownership in terms of the positive or negative aspects of renting or owning their current home. In terms of the pros of renting, respondents mentioned cheap rent and no maintenance responsibility; in terms of cons, also most half mentioned a problem with their home, and others mentioned the lost money in rent (could have bought their own home), and insecurity in losing the home if they left. Respondents mentioned improved control and security and passing it on to future generations as pros of ownership, some responses corresponded to pride and very few to economic advantages. While the study looked at Indigenous communities, these findings are likely the same in a non-Indigenous context, although the inability to “own” reserve land complicates the benefits of home ownerships for Indigenous people on reserve. The authors sort the cons of home owning into three categories: land related issues, added responsibility for maintenance, and additional costs and repayments. There were slightly more respondents who preferred to buy a new home than to buy the home they were living in. Households are limited in their ability to afford home repayments, excluding many from home ownership without subsidies.

The report ends with suggestions for how to design a home ownership scheme in Queensland and includes the following: aim is for security (not economic) and to provide home owners capacity to borrow money; include a house valuation technique for a closed housing market; restrict the sale of houses to third parties (other than owner and Council) such as permanent Indigenous members of the communities, or extended families, descent groups, clans or language groups, community groups forming cooperatives (hold shared title on more than one house); cannot alienate the base land tenure of the house blocks; repayment schemes should match ability and provide insurance, and include mechanisms to avoid defaulting on payments; proactive approach by Councils to repairs and maintenance; location determined by serviced blocks; and local-level decision making. While the specific findings from this study cannot be generalized to the Canadian context despite some similar structural issues, this study highlights

that each Indigenous community will have unique needs that will need to be considered for any housing or home ownership strategies which is helpful to illuminating possibilities within a Canadian context.

In terms of efforts for supporting housing in Canada for Indigenous people, the Indigenous Supportive Housing Program (ISHP) in Ontario is specifically designed to be administered by Indigenous organizations for Indigenous people in need of housing and support services (Ministry of Housing 2017). The ISHP is informed by the Indigenous Housing Strategy Engagement Table discussions regarding the fundamental need for Indigenous ownership, management, design, and construction of housing that addresses the housing and related needs of First Nations, Métis and Inuit individuals, families, and communities across the life cycle in a cultural and wholistic way. The ISHP has been informed by various strategies including the Poverty Reduction Strategy, Expert Advisory Panel on Homelessness, Long-term Affordable Housing Strategy, Comprehensive and Mental Health Addictions Strategy (Phase 2), Development Services Transformation.

Similarly, the Ontario First Nations Technical Services Corporation (OFNTSC) advises on housing related issues. In a 2018 report *Exploring First Nations Housing Needs and Solutions in Ontario*, they welcome the National Housing and Related Infrastructure Strategy as a necessary first step in addressing on reserve housing. The OFNTSC report calls for the strategy to build on the “innovative and culturally appropriate solutions” already ongoing in First Nations communities and that the solutions must be “designed, constructed, and delivered by Indigenous communities and organizations” consistent with UNDRIP. A 2015 report to Senate stated that federal funding is woefully insufficient and that there was a \$8.2 billion gap (growing to \$9.7 billion in five years) in funding for on-reserve housing and infrastructure needs (Patterson & Dyck 2015:12). One of the report’s recommendations was to re-evaluate, strengthen and expand existing programs “such as the Ministerial Loan Guarantee and the First Nations Market Housing Fund to make sure that these programs actually result in more homes for First Nations people” (Patterson & Dyck 2015:2).

In looking at the landscape of insurance arrangements for 116 First Nations across Canada, there are similar but also unique themes that emerge when compared to Australia (Wellman 2000, 36). This research shows that some groups developed insurance schemes to meet local needs through innovative solutions. Others were completely uninsured. The study incorporates a survey that asks questions related to the arrangement of insurance assistance, including amounts, perceptions of affordability, coverage, and any desire for more assistance. This piece is a comprehensive foray into the landscape into the specific challenges and opportunities for insurance on-reserve for First Nations. It provides a picture of the current landscape for insurance arrangements as well as the innovations in the face of current problems experienced by these communities. This source was written in 2000, meaning that over two decades of developments in the insurance space are missing from this piece. An update on the issues addressed in this survey would greatly contribute to the knowledge space regarding Indigenous insurance initiatives and products. The survey found that 36% of First Nations surveyed do not have insurance on their non-CMHC dwellings (Wellman 2000:3). Of those who are uninsured, 76% cited that high cost of insurance, lack of funds, and inadequate budgets were the reasons they were uninsured. Several respondents also expressed a desire to improve fire safety which contributes to a lack of predictability and overall challenge getting affordable insurance. 17% of respondents said that their coverage was less than replacement value on some or all units. Findings also pointed to Ontario and Quebec being relatively cheaper than the Prairies.

Of those who were insured, First Nations utilized a variety of innovative insurance arrangements, including two structured First Nations “self-insurance” initiatives, an interesting development that would benefit from an updated review. Self-insurance includes having a community such as First Nations cover risks or a portion of risks through a portion of own resources earmarked for insurance purposes (Wellman 2000:36). Self-insurance is attractive because if groups pool resources, it can lead to cheaper insurance as a result profit retention based on pooled resources for the group. It can also allow comprehensive risk coverage and promotion of loss reduction. This source also describes three approaches to insurance coverage. The first is the risk sharing

pool where portions of owners' resources pool together to cover some or all the risk. The second is the Captive Insurance Company where a group can assume all risk save for catastrophe (for which reinsurance is used). The third is a middle ground between the two called Reciprocal Insurance Exchange, where a group assumes all risk except for catastrophic risk but makes one-time assessments if claims exceed premiums taken in by the pool (Wellman, 26).

In addition to providing an overview of the insurance arrangements available currently to First Nations, the paper provides conclusions helpful to understanding the market which can inform potential solutions. First Nations are becoming increasingly receptive to greater competition in the insurance market and show a willingness to switch brokers for superior products that address their needs (such as fire safety and affordability). The paper also points to the fact that nearly all First Nations have a large band owned housing sector and that there is a preference for First Nations owned insurance provider and there is a need for tailored solutions for on-reserve housing which flow profits back to communities. The piece ends with a series of suggestions for these tailored solutions.

A Canada Mortgage and Housing Corporation (2015) publication highlights a 2008 on-Reserve Homeownership Loan Insurance Pilot product for the Nak'azdli First Nation in British Columbia. It was noted that while on-reserve land cannot be mortgaged, in this pilot study there were allowances granted for Band members to receive independent financing from banking institutions with reduced down payments using a trust agreement (CMHC). The project was intended to reduce housing shortages and create jobs. This information was released in 2008 and the results of this program as well as any updates to the program would be immensely helpful for further analysis.

The First Nations Market Housing Fund (FNMHF) was put in place in 2008 to support market-based housing; it is a long-term, self-sustaining, non-profit trust to facilitate funding for market-based funding in FN communities. The CMHC Leasehold Lending on-reserve program is for the

purchase and construction of housing on leased lands on-reserve. It provides a program available to First Nations with a breakdown of the requirements for eligibility.

The CMHC Leasehold Lending "on-reserve program available to First Nation borrowers" program aims to support the building and buying of housing on leased on-reserve lands. This is in place of the typical Ministerial Loan Guarantee applicable on enforceable mortgage security. The following main features of the program include:

- Loans For Housing Located in a Leasehold Residential Housing Development  
This applies to First Nation communities leasing their land to construct market housing for the public (First Nation included).  
However, this leasehold arrangement must be acceptable to CMHC before a leasehold project is eligible for mortgage loan insurance.
- Loans For Housing Located on self-Leased Lands. In this case, First Nation communities allow members holding individual interests in reserve lands to lease their land allotment to themselves.
- The form of the lease must be acceptable to CMHC before a loan application on self-leased land is eligible for mortgage loan insurance.
- The First Nation must have the necessary provisions in its land code or constitution to support loans for housing located on self-leased lands.
- Not available for chattel mortgages.

The eligibility requirements that were summarized in the product sheet highlight the following: Loan to Value Ratio, Minimum Equity Requirement, Purchase Price/Lending Value, Amortization, Location, Down payment sources, Creditworthiness, Debt Service Maximum threshold, Interest Rate, Advancing options.

Further research into off reserve or out of Territory shows that there is a need for subsidized Indigenous housing. For example, a study conducted by the Ontario Non-Profit Housing

Association in 2020 revealed that as many as 22,000 units over 10 years were estimated to be needed for Indigenous housing. The report explores the benefits of investing in Indigenous community housing. Through a comprehensive cost-benefit analysis, evidence is shared indicating that with a construction cost of \$7.3 billion, 95,000 year-jobs can be created over a 10-year period, add \$3.8 billion to the economy, and save the province a total of more than \$14.3 billion. The report offers a proforma Statement of Operations based on revenues and expenditures – with a focus on the typical costs that an Indigenous housing provider would need to cover. The table below shows the expenses related to insurance and interest on debt given the topic of this work.

	<b>2 Provider, 200 Units</b>		<b>56 Providers</b>	
<b>Insurance Cost</b>	<b>%</b>	<b>5,000 Units</b>	<b>2,200 per year</b>	<b>22,000 over 10 years</b>
\$63,000	2.8	\$1,575,000	\$693,000	\$69,300,000
<b>Interest on long-term debt</b>				
\$32,000	1.4	\$800,000	\$352,000	\$35,200,000

The overall proforma shows that operating expenses provide 50% of the revenues. The rest of the report looks at housing need, homelessness, affordable housing stock, benefits of providing housing and the cost of homelessness, in addition to other housing-related topics. The indirect benefits to housing are shown through the lens that housing is a determinant of well-being and has an impact on other social indicators including recidivism and incarceration rates, schooling and employment outcomes, and reductions in public spending on health and social services.

In addition to on reserve and out of Territory there are many studies that look at Indigenous housing needs in urban centers. One study by Kimble (2007) that looked at Black Indigenous and People of color (BIPOC) citizens found that the role of national housing in the US and its policy role in perpetuating housing inequality within African American communities. It examines Federal Housing Administration (FHA) documents to identify how the agency played a direct role in the ghettoization of African Americans communities. In describing this role, the paper suggests that the FHA went far beyond merely approving of racial discrimination and

goes into depth in exploring the extent to which it did so as crucial to building a clearer understanding of the origins of urban racial inequality in America. We included this source since it examines federal housing with a pattern of sub-processes for containment of Black people in the older residential neighborhoods where they were most likely to settle after migrating to the city. The paper confirms the role of the federal agency in advancing a national segregationist agenda by deflecting blame onto the private market for policies that it had standardized and mandated. This paper identifies the role of federal directives in the housing market and the rise of inequality by design. This opens up a discussion about gender and racially segregation policies with respect to housing for disenfranchised groups. Given the impacts of colonialism and the lack of consideration of Indigenous needs and issues in federal policies, discussion of gender and racially segregated polices warrants further research in a Canadian context to better understand the impacts of housing-related policies on Indigenous peoples in Canada.

For example, Pope and Sydnor (2011) look at statistical models used for assigning prices or eligibility to be implemented when there is concern about discrimination. What this work provides is a framework to address these issues of intersectionality and offers a method using data from the Worker Profiling and Reemployment Services system (WPRS). One of the main findings of this study highlights that in many instances, factors such as race, gender, and age are prohibited but the use of variables that correlate with these omitted characteristics (e.g., zip codes, credit scores) is often contentious. While the method has some clear appeal in this regard, there are some concerns with practical implementation. For example, in the authors application to the WPRS system, information about race, age, and gender were all available. However, in many other cases such as mortgage or insurance markets, data on race and other characteristics may not be collected. What this suggests is that a mandate to begin collecting race-based data has issues in that insurance companies may begin to use these data for predictive purposes, rather than for the purpose of eliminating discrimination. But it is worth emphasizing the importance of regulatory and legal institutions to help to ensure that these data are used appropriately should these data be collected and used.

## Section Three: Lending Programs and Financing Options

The Canada Mortgage and Housing Corporation (CMHC) commissioned Marsh (an insurance company) to review the availability and affordability of residential property insurance. Marsh (2021) surveyed and interviewed 36 insurers about their coverage, appetite, capacity, and challenges for commercial residential and personal homeowners' insurance. The process explored strategies for controlling insurance premiums, improving coverage and factors/drivers affecting price. In recent years, insurers have increased pricing and reduced capacity to have a more profitable business model in the context of rising catastrophic losses and claims costs. The report presents regulatory factors for residential property insurance and reviews the roles and responsibilities of various actors and their risk concerns including claims risks, underwritten exposures and reinsurance arrangements. For residential property insurance, insurers evaluate the risk based on Construction (materials, age, building height), Occupancy (residential/commercial), Protection (active and passive systems in place) and Exposure (external hazards) (COPE factors) to determine what can be underwritten, how and at what price and coverage terms (Marsh 2021:7). Increased water damages are a common trend across Canada and impacting insurers' profitability, as are asbestos abatement and undervalued properties.

The report singles out northern Canada as having unique challenges for residential insurance because of insufficient volume of business to cover costs and high costs of doing business in the North, lack of access to fire protection in remote locations, and the prevalence of seasonal flooding. The report does not mention the impact of permafrost melt on damage to buildings and/or infrastructure. The report also mentions climate change and the role it will play in more severe, frequent and intense disasters and how that will threaten insurers' ability to provide coverage; it also includes the risk of earthquakes in BC. Given that 19% of the Canadian population live in flood-prone areas – including our major cities that are densely populated – insurers do not have the capacity to provide flood coverage in high-risk flood zones. External hazards such as wildfires, however, are also included in the evaluation of risk (under exposure),

which each company assess and underwrites differently. Fire losses (either from wildfires or from housefires) are also more severe in remote communities which lack access to adequate fire protection, and which simultaneously have a higher probability of fire (Marsh 2021:11). The report also reviews specific risks in condos, stratas and apartments; single-family dwellings and townhomes; and construction and developments. Taken together the increased costs in building, labour and material costs and a “cheap and cheerful” approach to construction do not mix well with increasing catastrophic loss events; and led to a needed correction in the market of higher premiums and lower appetite to cover specific areas or restrict terms and conditions. The final section reviews some risk mitigation strategies in specific sectors in order to reduce the frequency and the amounts of claims. These include individual factors like awareness of risk, budgets for maintenance, improving building resilience and reducing probability of water damage. In addition, where municipalities approve building permits is essential to lowering flood-risk, higher quality materials and construction also matter.

The Marsh report concludes that historical conditions created unfavourable conditions for insurers and a market correction was necessary but created rising premiums, higher deductibles, and more restrictive terms and conditions. These conditions better align with the actual risk insurers take on and should address the challenge of reduced insurer appetite (p.19). The uncertainty of climate change threatens the insurers, so the focus should be on what can be controlled: increasing resilience and education and awareness for reducing risk to lower the frequency and severity of claims. The Marsh findings, however, represent the insurance industry and do not include Indigenous perspectives on how this affects Indigenous communities.

### **Lending Guarantee, Construction Insurance, and Property Insurance**

Pomeroy and Falvo (2013) discuss the role of housing policy directives particularly in the context of an industrialized liberal market economy and the role of mortgage insurance. Market limitations of this approach are outlined and social housing highlighted the role of social subsidies. Outlining the role of programming, this article touches on role, structure and funding

in delivery social housing. Shifting focus and language to 'affordable housing' indicated an underlying shift in approach to capital assets. The establishment of trust funds supported this shift from a budget, structure and investment approach. The article situates national and global contexts in shaping housing policy.

One notable policy shift was the change in respect to mortgage insurance policy. Implemented late in 2006, this policy served to extend the maximum amortization on insured mortgages from 35 to 40 years. It also eliminated any down payment minimum for qualifying buyers. The intention was to benefit younger households seeking home ownership. When implemented, this policy saw a significant rise in consumer debt, and the policy was subsequently reversed. This policy approach reinforced the government's appeal to the voting base because the pattern of majority of moderately priced new homes were mostly developed in suburban growth areas of larger cities. Furthering in this vein of policy response, the federal government worked with Indigenous leaders to establish the \$300- million First Nations Market Housing Fund through CMHC. Created as a loan guarantee fund, the policy objective was to support the use of private lender capital for housing on reserve, increase overall housing supply, and provide participating families and individuals with a means to build equity and generate wealth. This was intended to be provide a low-cost initiative and a loan guarantee reserve rather than an expenditure. This initiative was intended to enable the goals of First Nations' autonomy and self-sufficiency while ensuring consistency with the government directive to emphasis market-based policy solutions. The products offered by the FNMHF are limited to those permitted in its' enabling legislation.

A report released in 2020 by the BC Financial Services Authority provides information, based on conversations with stakeholders in the insurance sector, on the current state of increased strata property insurance premium rates. Strata ownership involves the owners of individual lots or housing units to own their property, while holding a fractional share of common property (i.e., land and common buildings of the strata corporation). While strata ownership is not a practice commonly employed in First Nation territories, if at all, there are potential lessons that might be

relevant to an Indigenous context. The BCFS (2020) described the situation as unhealthy and “the perfect storm” which was the result of multiple factors including: loss reduction, catastrophic exposure, education (information sharing), risk model changes, lack of premium increases, building construction, increasing insured value, and innovation (such as BC private-sector Insurance company, private-public partnerships, and captive insurance). With respect to reflections on the likely duration of this situation and implementing mitigations, it is noted that global and local issues and natural risk factors including earthquakes and climate change will make this challenging in the short or even medium term.

Although the report notes that there are no easy solutions to the premium rate issue, it offers some guidance for the way forward. Two main ideas are addressing gaps in data and clarifying home warranty insurance. It is highlighted that the elimination of Best Terms Pricing in insurance will mitigate against premium increases for some properties, whereas for premiums and deductibles reductions, claim costs must improve. One change that has occurred is the passing of Bill 14 - *Municipal Affairs and Housing Statutes Amendment Act (No. 2)*, 2020, by the BC Government. Some noteworthy changes to enhance access and promote transparency included banning the practice of insurers or insurance brokers paying referral fees to strata property managers, amending the Financial Products Disclosure Regulation to require advance notice of premium increases or denial of coverage and disclosure of agent commissions, establishing guidelines on what strata corporations are required to insure, and capping liability for individual strata owners held responsible for damage. In addition, a range of revisions were enacted to the FIA and the *Strata Property Act (SPA)* to mitigate the impact of insurance challenges on strata corporations and strata owners, also in British Columbia.

The majority of the document focuses on the findings and observations. These findings speak to the issues and factors impacting strata insurance premiums and insurer participation. The report notes that the external environment is evolving and resulting in increased impacts on the insurance market in terms of premiums and market supply – more so than in the past. Steps must

be taken to tackle the structural issues that impact supply, including product innovation as a key strategy, regulatory issues, innovation, and education.

The report highlights four critical issues that would need to be resolved in order for the strata property insurance situation to adjust and revert to a healthier state.

- Claims loss experience needs to improve;
- The overall risk concentration insurers are facing must be lowered;
- Exposure to excess loss from earthquake risk in the market needs to be addressed; and
- There needs to be a better flow of information between stakeholders and improved education of strata councils and owners.

### **Homeowner Insurance, Large Scale Development (Commercial/ multi-unit housing) and Insurance Provision**

This section provides an expansion on other insurance sections when we consider the uncertainty of climate change and the extent to which climate change threatens the insurers. In the context of risk and insurance there often is a change in focus on what factors should and can be controlled: increasing resilience and education and awareness for reducing risk to lower the frequency and severity of claims.

In recent years, insurers have increased pricing and reduced capacity to have a more profitable business model in the context of rising catastrophic losses and claims costs. The Marsh report (2020) presents regulatory factors for residential property insurance and reviews the roles and responsibilities of various actors and their risk concerns including claims risks, underwritten exposures and reinsurance arrangements.

According to a 2020 report on flood risk in Canada one of the guiding principles for financial risk management of floods in Canada should be inclusivity (along with affordability, efficiency, optimal compensation, shielding the taxpayer, and financial sustainability) (Golnaragi et al.

2020: 42). In terms of inclusivity, the report states “Insurance solutions should be available to all primary-residence property owners, irrespective of the level and type of flood risk they face, e.g., pluvial, fluvial, or coastal. Indigenous residences, which are often covered by commercial insurance, and other vulnerable communities require particular attention and possibly a concurrent programme” (Ibid).

## Section Four: Disaster Insurance and Disaster Recovery Funds

Disasters disproportionately impact Indigenous communities. There are various causes for these disproportionate impacts, including a community's relative remoteness, isolation in fire-prone areas (dense forests), and a lack of emergency services or technical capacity (Mihychuk 2018, 1). In addition, the legacy of colonialism affects trust, coordination, and collaboration during emergency responses; results in a failure to utilize local and traditional knowledge; and has left deep social and health inequities that render some communities more vulnerable to mental or physical health impacts (National Collaborating Centre for Aboriginal Health 2019<sup>1</sup>). As noted above, Charkrobarty et al (2021) find that although the threat of flood is the same between Indigenous and non-Indigenous communities, the *risk* is higher because of underlying social and economic inequities or vulnerabilities.

Federal, provincial and territorial, and Indigenous governments, non-government organizations, business owners and individual citizens share responsibility for emergency management in Canada. On many reserves, service agreements with ISC and provinces or territories ensure oversight for emergency management. Nonetheless, a 2018 study by the *Standing Committee on Northern and Aboriginal Affairs* found there were many gaps in the arrangements. The report's first section reviews the contexts and framework in which different levels of governments, First Nations, and third-party organizations (e.g., The Red Cross) prepare, mitigate, respond, and recover to emergency situations; it includes specific roles and responsibilities, including those of First Nation Communities. The multi-level nature of the Emergency Management frameworks and agreements creates major problems at multiple stages of on-reserve emergency management because it is not always clear who is responsible for what (Mihychuk 2018:13-14).

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<sup>1</sup> National Collaborating Centre for Environmental Health. "Indigenous Disaster Response." Updated September 25, 2019. <https://ncceh.ca/environmental-health-in-canada/health-agency-projects/indigenous-disaster-response>

The second section details phases of emergency management and their inadequacies. This includes: a lack of funding and training for mitigation and preparation; exclusion of First Nations, their expertise and cultures in coordinating response activities - as well as responding in a manner that is too slow and with evacuations that do not attend to First Nations' realities such as inadequate basic necessities and accommodations, and considerations of cultural safety and well-being; and finally, problems during recovery including a lack of consideration for the full range of social, health and economic impacts, and problems with reimbursements. The final section on fire safety on reserves lays out the context in which fire incidence and loss of life is much higher in First Nation communities. The report highlights a lack of prevention and public education, inadequate funding and an insufficient funding model, and a lack of building and fire codes and a lack of enforcement of those that do exist as problems for fire safety on reserve.

Nonetheless, there are several sources of funding for First Nations related to disasters from federal, provincial and other emergency management sources. For example, ISC administers the *Emergency Management Assistance Program* which provides funding for the four pillars of emergency management: mitigation and preparation efforts and the response and recovery needs of individuals and communities. This includes funding during emergency responses (e.g., temporary displacement, transportation, repatriation) and in recovery. Crown-Indigenous Relations and Northern Affairs Canada administers the *First Nations Adapt* program which provides funds for climate risk assessments and adaptation planning in communities south of the 60<sup>th</sup> parallel, particularly those at significant risk of flooding. The *Climate Change Preparedness in the North Program* provides similar types of funding for communities in the North. The *First Nation Infrastructure Fund* provides funding to communities for improving community infrastructure and is a complementary program to the *Capital Facilities and Maintenance Program* which includes funding for structural infrastructure (previously disaster mitigation and fire protection. Infrastructure Canada administers the Disaster Mitigation and Adaptation Fund; in the 2021 budget announcement, the government allocated \$1.35 billion for this fund and allocated \$138 million for Indigenous communities. These funds are for

structural and natural infrastructure projects to increase the resilience of communities impacted by natural disasters triggered by climate change.

While it is important to note these programs are not specifically targeting insurance premiums, adapting to climate change, which involves reducing exposure and vulnerabilities to risks, would reduce insurance costs down the road. From this perspective, it behooves insurance companies to invest or support policies for risk reduction (climate adaptation) as the rate of return on mitigation and preparation efforts in relation to response and recovery costs in the face of a disaster is estimated at \$7 saved in response/recovery for every \$1 invested in mitigation (Shreve & Kelman 2014). According to Golnaraghi et al, (2020) investment in risk reduction actions can lead to improved insurance coverage conditions and reduced insurance costs. What this means is that every reduction in risk results in better health, wellbeing, and ultimately success of the entire community. This study points out that risk reduction actions by a household can include the following:

- good maintenance of the home and heating systems,
- safe use of the electrical system,
- installation of smoke alarms,
- keeping a fire extinguisher near heat sources,
- installing a sump pump to protect the basement from flooding, etc.

Golnaraghi et al, (2020) also discuss the extent to which a sound fire protection grading by the Fire Underwriters Survey will provide more favourable insurance terms and pricing. And other measures, such as regular fire safety inspections of the dwellings, can reduce the frequency of fire losses (Golnarahi et al, 2020). Furthermore, a 2022 review of studies on First Nations Home Flood insurance needs indicate that if climate change risk mitigation strategies, including the adoption of flood insurance, are to be effective for reducing vulnerability and increasing climate resilience, efforts must align with Indigenous cultures, land use practices, knowledge, ways of knowing and worldviews (Golnaraghi et al, 2020). What this study highlights is that more Indigenous community specific climate change risk assessment and mitigation and adaptation

measures are needed to prevent the exacerbation of existing socio-economic conditions that disproportionately impact Indigenous peoples and communities. What is also important is that, where climate change results in the displacement of communities, this poses an existential threat to the culture of indigenous peoples—when Indigenous people lose their land to climate change, their culture is irrevocably impacted (Golnaraghi et al, 2020). Finally, according the report by McBean et al. (2021:3) on building climate resilience communities, there is also need “to strengthen collaboration between governments, Indigenous communities and all people to promote reconciliation, opportunities for inclusion in adaptation capacity building, and risk reduction actions. Alongside this, there is a need to recognize the importance of Traditional Knowledge and a collaborative and science-based approach in ways that are ethical, equitable and just.”

Of further note, the costs from disasters have been increasing, and will likely continue to increase in the face of climate change. From 2009 to 2020, damage and losses from extreme weather and wildfires in Canada – increasingly linked to climate change – cost an average of \$2 billion per year; this is six times the annual average over the previous 25 years (Adriano 2021)<sup>2</sup>. Historically, Canada insurance companies did not provide insurance for loss or damage from overland flooding. More recently, this has begun to change and homeowners can now procure overland flood insurance which is optional and assessed on risk. Insurance coverage for coastal storm surges is also now available in BC and New Brunswick (Westcott 2018<sup>3</sup>). One of the challenges, however, is that homeowners do not know their risk: a 2017 study found that only six percent of Canadians living in high-risk flood zones were unaware of their risk (Thistlethwaite, Henstra, Peddle, Scott 2017<sup>4</sup>, 1). Furthermore, although many Canadians accept their responsibility for protecting their homes, there is a disconnect between individuals paying higher insurance costs for their homes (individuals), decision-making on housing

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<sup>2</sup> Adriano, Lyle. 2021. “IBC Advises Homeowners to Prepare for Worsening Weather on Emergency Preparedness Week.” *Insurance Business Canada*, May 4, 2021. <https://www.insurancebusinessmag.com/ca/news/catastrophe/ibc-advises-homeowners-to-prepare-for-worsening-weather-on-emergency-preparedness-week-254037.aspx>

<sup>3</sup> <https://www.watercanada.net/storm-surge-insurance-now-available-to-n-s-b-c-residents/>

<sup>4</sup> [https://uwaterloo.ca/partners-for-action/sites/ca.partners-for-action/files/uploads/files/canadian\\_voices\\_on\\_changing\\_flood\\_risk\\_fnl.pdf](https://uwaterloo.ca/partners-for-action/sites/ca.partners-for-action/files/uploads/files/canadian_voices_on_changing_flood_risk_fnl.pdf)

developments and land use planning decisions (which generate a tax base and revenue for municipalities), and who pays for the recovery when disasters do strike (federal government and individuals). As discussed by Barrasa (2020), due to the rising costs from disasters, the Insurance Bureau of Canada (IBC) has called on the government to invest in reducing or removing the impact of extreme weather. This includes protecting communities, bringing building codes to date, rethinking land planning, and incentivizing people to move away from high-risk areas. The latter is a problematic proposition for anyone, but particularly for Indigenous peoples with ties to land and territory, nonetheless homes are already being relocated away from the water's edge in Tuktoyaktuk where coastal erosion threatens homes. In terms of land-use planning, communities opting into the First Nations Land Management Act must ensure that decisions for development take into account future climate risks - unlike in municipalities where incentives exist to build in high-risk areas (riverfront, waterfront, slopes) for tax and revenue purposes and there is a disconnect between who decides, who benefits and who pays in the context of disaster risk. In effect, augmenting community protections addresses the vulnerability and exposure dimensions of risk, when there is little to be done about the hazard dimension. A case study of two northern Ontario communities repeatedly evacuated by flood, however, demonstrates that short-term responses can also produce greater vulnerability in the long-term (Khalafzai, McGee & Parlee 2021). The report advocates for long lasting responses for people in this community by considering the long-term adaptation responses for resilience-building which must take in account the short-term coping capacities and community-specific ground realities. Otherwise, they can significantly increase the physical vulnerability of residents.

Vanessa Barrasa (2021) provided a study that articulated the financial costs of severe Weather to insurers and taxpayers. It points out that of the significant floods, major rain/snow events and windstorms in 2019, insured damage peaked at \$1.3 billion as recorded by Catastrophe Indices and Quantification Inc. This made 2019 the seventh highest year in insured losses. The article states that there was no record of a significant loss. However, several more minor, severe weather conditions were across the country. The article breaks down the Top Insured Damage

Severe Weather Events in 2019 by showing dates, weather events, loss figures in millions, and specific locations. The highest loss came in at 250 million in October due to a storm in Eastern Canada. The lowest was a loss of \$ 40 million due to the Winter storm in Easter Canada in late January.

The article then shows the Top 10 Highest Loss Years On Record. The highest total loss was incurred in 2016; a fire at Fort McMurray, Alberta, would result in \$5.261 billion in losses. This is followed by 2013 floods in Alberta and the Greater Toronto Area resulting in a loss of \$3.418 billion. The least expensive loss was the 2010 Calgary rainstorm resulting in a \$1.226 billion loss. Due to these rising costs, the article states that the Insurance Bureau of Canada (IBC) has called on the government to invest in reducing or removing the impact of extreme weather. This includes protecting communities, bringing building codes to date, land planning, and incentivizing people to move away from high-risk areas. The article notes that the costs associated with severe weather combinations impact taxpayers just as much as insurance companies. Hence the Insurance Bureau of Canada (IBC) seeks to collaborate with all stakeholders to reduce the strain and/or burden.

A report of the Report of the Standing Committee on Indigenous and Northern Affairs of the House of Commons providing insights on house fires and wildfire management in Indigenous communities, highlights the disproportionate impact on First Nations communities of emergency events, discrepancies between provinces' responses and service delivery, and living conditions in First Nation communities that lead to fire-prone housing (Mihychuk 2018). The report provides 11 recommendations (all but one) for Indigenous Services Canada, which it based on nine public hearings and input from 47 witnesses following the severe 2017 wildfire season, particularly in Western Canada. The report's first section reviews the contexts and framework in which different levels of governments, First Nations, and third-party organizations (e.g., The Red Cross) prepare, mitigate, respond, and recover to emergency situations; it includes specific roles and responsibilities, including those of First Nation Communities. The multi-level nature of the Emergency Management frameworks and agreements creates major problems at multiple stages

of on-reserve emergency management (Mihychuk 2018:13-14) because it is not always clear who is responsible for what. The second section details phases of emergency management and their inadequacies. This includes: a lack of funding and training for mitigation and preparation; exclusion of First Nations, their expertise and cultures in coordinating response activities - as well as responding in a manner that is too slow and with evacuations that do not attend to First Nations realities such as inadequate basic necessities and accommodations, and considerations of cultural safety and well-being; and finally, a lack of problems during recovery such as those that do not consider the full range of social, health and economic impacts, and problems with reimbursements. The final section on fire safety on reserves lays out the context in which fire incidence and loss of life is much higher in FN communities. The report highlights a lack of prevention and public education, inadequate funding and an insufficient funding model, and a lack of building and fire codes and a lack of enforcement of those that do exist as problems for fire safety on reserve. The committee also documented that the federal government stopped collecting data on on-reserve fire incidents – which creates an ongoing problem for tailoring fire prevention programs to community needs. For each problem or issue raised, the report offers a recommendation to Indigenous Services Canada with the larger aim of increasing funding and support to FN communities; and often employs direct quotes from those with whom they spoke.

The report and its recommendations provide a clear set of priorities for improving emergency management and fire safety in FN communities. The first recommendation, to recognize First Nations as equal partners, is imperative for the subsequent recommendations. The recommendations are also clear and their implementation is easily measurable. The recommendations' focus on Indigenous Services Canada is perhaps limited given the different levels of governments and number of actors required for addressing emergency management and fire safety. Furthermore, the report fails to mention colonization or other structural/systemic challenges and inequities as a cause for the discrepancies between First Nation communities and non-Indigenous communities in terms of the impacts of emergencies and fires—instead limiting the explanation to FN communities' remoteness or isolation. Finally, the report refers to First Nations communities as if they are all the same; the report does not

appear to recognize that each nation has unique and specific needs, and that effective emergency management and fire safety be community-driven and/or Nation-based. Further research is warranted to understand the effects that the colonial system and Indian Act regime have on the emergency management capacities of Indigenous nations (i.e., to plan, prepare, prevent, and respond to natural disasters/emergencies), and the nature and magnitude of emergency-related threats they face.

According to Murphy et al, (2022), flood events are Canada's most frequent and most expensive natural disaster in Canada and since 1900 there have been 289 floods, almost triple the number of hail and thunderstorms, the second most frequent natural disaster. Prior to 2014 private flood insurance was not available in Canada (Thistlethwaite 2017). Murphy et al. (2022) wrote *First Nations Home Flood Insurance Needs Initiative* and the authors found that First Nations on-reserve are more vulnerable to flooding which has become a threat to the safety of communities. One of the main issues that was identified was that there is little information available that pertains to access to flood insurance for on-reserve communities even though there was a general consensus of the impacts of climate change with respect to increase in flooding risks. This is especially paramount in Indigenous communities, who do not have access to private flood insurance, and in some cases such as the Bow River Flood in Alberta in 2016, have inadequate reserve housing policies. The main highlight of this study points to the fact that Indigenous peoples are already at risk for disproportionate harms of floods linked to the historical and ongoing harms of colonialism and displacement from their traditional territories; flooding causes displacement which causes harm to Indigenous peoples. Furthermore, flooding now surpasses fires as the main source of property insurance claims in Canada – in terms of both volume and cost (Murphy et al 2022: 10).

## **Risk Assessment**

There are different ways to look at risk assessment, either from the lender or from the borrower, and there are also numerous factors that determine the type of risk model that should be considered in particular housing situations. In this section we explore different kinds of risk models in the context of financial, climate change and even disasters in an ever-changing

social world. Generally speaking, a risk model is an assessment tool that guides a process of evaluation to support lenders mitigate and manage risk and for borrowers to gain awareness of different types of risk situations. For example, let's consider risk in the context of disasters. In this case risk is a function of hazard, exposure and vulnerability (Lebre 2011, IPCC 2018). Flood risk is an increasing concern in Canada due to earlier and faster snowmelt, changes in precipitation, and increased temperatures (Gaur, Gaur, & Simonvic 2018: 18). Chakraborty et al 2021 spatially map flood exposure and social vulnerability across Canada to show that Indigenous populations living on reserves, have higher social vulnerability and thus greater flood risk than the general population. The authors construct a social vulnerability index pulling 49 context-specific variables (commonly used in flood and hazard research) representing socioeconomic, demographic, ethnic, and cultural characteristics.

The study examines exposure risk in a national context of residential properties over estimations of a 100-year period. The authors developed a social vulnerability index (SVI) that identified 49 variables from the national census data that focuses on the demographic, social, economic, cultural, and infrastructure/community vulnerability indicators. The study identifies that 81% of the 985 Indigenous land reserves were exposed to flooding that impacted residential properties. Early analysis indicates that residential property flood exposure is similar between non-Indigenous and Indigenous communities, but specifically that socioeconomic vulnerability is higher on reserve lands. This leads to the confirmation that the overall risk of Indigenous communities is considerably higher (Thistlethwaite et al. 2020). These findings suggest the increased local need for more confirmation of flood risk in Indigenous communities to better address uncertainties and vulnerabilities in national scale analysis and the subsequent risk modeling.

In the aftermath of the 2016 Alberta wildfire, Montesanti et al. (2021) conducted sharing circles in urban and rural communities to understand Indigenous perspectives of coping, individual and collective strengths that aided in coping with significant losses. The study highlights the extent to which Indigenous residents in the Regional Municipality of Wood Buffalo (RMWB)

were impacted by the Horse River wildfire. Many Indigenous communities do not have the necessary resources, capacities, and infrastructure to adequately mitigate, respond to and recover from disaster events (Beverly & Bothwell, 2011). Pre-existing social and economic inequities and past historical trauma also attribute to Indigenous residents' experience of a disaster evacuation and displacement. Overall, the study describes how Indigenous people felt they had insufficient support to navigate the rebuild of their homes, which includes permit requirements, and insurance coverage. Other people also shared the challenges they faced when it came to rebuilding their homes due to the cost of construction, permit requirements, and lack of insurance coverage. Although this disaster highlighted the structural inequities for Indigenous peoples in RMWB, one of the major features of the study was the resilience and strength that emerged for the community during this crisis. In particular, a major strength noted was the generosity and ability to come together as a community and connect to culture, spirituality, and tradition. For example, elders from rural First Nation communities in the region pointed out the limited support their community received from the municipality during and post evacuation, in comparison with the institutional support provided to Fort McMurray evacuees.

Smith and Daniels (2017) explore the ways that risk pricing unintentionally results in cost differences among different races, effecting access to mortgages. The authors address questions around inequity in mortgage costs because of underwriting practices in the industry. Specifically, they seek to answer if "borrowers face higher costs for fixed-rate mortgages in neighborhoods where a significant number of minorities (black and Hispanic) reside? And does the cost differential in mortgage pricing indicate efficient pricing where banks charge higher interest rates for riskier loans with higher probabilities of default?" (Smith & Daniels 2017:323). Though these findings may obliquely relate to the Indigenous experience in Canada, there exists a gap with respect to the unique experiences of Indigenous communities because the central question of this paper is whether borrowers of colour face higher costs than their white counterparts with similar credit. The paper finds that this is indeed the case. Specifically, neighbourhoods with a high density of minority households experience significantly higher

costs for mortgages than neighbourhoods with lower density of minority households. In fact, the results suggest that mortgage costs (expressed as interest) increase proportionally with the density of minority residents in the neighborhood. (Smith & Daniels 2017: 324). Price differences therefore do not necessarily imply efficient pricing. The paper also utilizes propensity score matching as a methodology to compare credit characteristics across neighbourhoods.

Again, even with comparable credit, racialized neighbourhoods experience higher costs to borrowing. The paper develops two hypotheses based on findings from the literature review. Its first hypothesis is that a “neighbourhoods’ racial composition matters in the financing of fixed-rate mortgages regardless of the race of the individual borrower. Individuals face a higher cost for fixed-rate mortgages if the neighbourhood comprises a significant number of minorities (black and Hispanic).” (Smith & Daniels, 326). The second hypothesis is that “a uniform relationship between the probability of default and interest costs across neighborhoods does not exist.” (Smith & Daniels 2017: 327). This suggests that higher interest cost does not reflect efficient pricing. This paper highlights a hypothesis worthy of research, that insurance costs as well as the cost of borrowing are higher for Indigenous groups than non-Indigenous groups.

In a 2011 critical review of the literature published on risk assessment over the previous 27 years, the authors found several significant results (Taroun, Yang & Lowe 2011). This review revealed significant results which are summarized as follows:

- Variants of Probability-Impact modeling are predominant; while traditionally the focus was on objective probability gradually subjective probability has become dominant;
- (2) Risk analysis of project duration or cost is prevalent; the analysis of project performance risk is hardly mentioned in literature. Further, no risk assessment approach was discovered that deploys a common scale to simultaneously assess the alternative impacts of a risk on the various project objectives.

A 2022 study examined co-developing a risk assessment process integral to the water safety planning methodology to determine if proactive risk assessment provides a beneficial management tool for First Nations water systems (Lane, Fuller, Dymont, Gagnon 2022). The study highlights a risk assessment web-application with First Nations stakeholders to identify hazards and assess risk in six Atlantic region First Nations communities. What is particularly interesting is that by applying the risk assessment application, it was possible to successfully identify high-risk hazards in each community, both risks specific to individual systems, and risks common at a regional level. The following benefits of a risk assessment web application were also identified which included: increased communication, data ownership and centralized data management. While not specific to on-reserve housing, the Fire Risk Model (FRM) evaluates building characteristics, height and fire safety features for single stairwell residential high-rise buildings to determine risk for occupants and the property (Hansen et al. 2018). To this end, the accepted design solution for a 22-meter-tall residential building is considered as a benchmark defining adequate safety and includes a stairwell with an airlock door system (two self-closing doors) open to the outside and traditional façade designs. Curtained walls also increase the fire risk because of increased fire spread.

Since considerable experience exists with respect to low- and medium-rise residential buildings, FRM design solution can be assumed to correspond closely with an empirical observation of societal fire safety preferences for multi-dwelling residential buildings. What this points to is that the FRM can be regarded as a robust indication of the acceptability of a design, thanks to the large societal experience with respect to the accepted reference design and the limited extension of scope from the reference design to high-rise residential buildings (Hamid & Ahmed (2016).

There are many risks in banking, and risk assessment in banks requires first understanding the meaning of risk which is denoted by the probability or uncertainty of some outcomes over others (Hamid & Ahmed 2016). There are multiple types of risk including credit, liquidity and interest rate risks when it comes to loans. Data mining is increasingly used by banks to assess risk across massive amounts of data, and predictive models, such as the one

developed by Hamid & Ahmed (2016), can predict loan risk based on customer behavior and previous payback history. The authors find that some algorithms are better than others at loan classification.

## Section Five: Indigenous Initiatives

In April 2021, ISC and AFN launched a Steering Committee on First Nation Home Flood Insurance Needs to better understand the home insurance needs from floods in First Nations communities. The Steering Committee is inter-governmental and inter-departmental, and it also includes the National Aboriginal Lands Managers Association (NALMA) and the First Nations Housing Professionals Association (FNHPA). The purpose is to co-develop recommendations for better options for flood insurance. After extensive consultation with several First Nations and lenders to create a tailored solution for the First Nations, the British Columbia Nak'azdli First Nation signed, in 2008, a "First Trust Agreement Corporation (CMHC) On-Reserve Homeownership Loan Insurance Pilot product." This agreement aimed to support affordable housing that meets needs. The Project essentially replaces typical mortgage security with a "trust agreement between CMHC and the First Nation." CMHC and First Nation would appoint Trustees to monitor the trust's activities and investments.

A statement by Chief Leonard Thomas of Nak'azdli explained that with the new Project, Band members could access independent financing from any available financial institution, reduce payments, and the Band Council could even take on additional projects. The article lists some of the expected benefits of this Project to the First Nations as;

- smaller and more flexible down payments at a lower interest rate than was previously obtainable for on-reserve housing
- reduction of housing shortages, job creation, and equity building opportunities for families.
- reduce overcrowding in the community housing
- provide a means for people on reserves to own and afford the homes they desire, considering their finances and individuals needs and preferences (CMHC 2015).

In addition to the Nak'azdli example, there are several examples of successful Indigenous initiatives across Canada where communities have improved their housing situation. The

Mohawks of the Bay of Quinte created an award-winning, energy-efficient, high-quality social housing units, as well as a home ownership program. Lac La Ronge and Tk'emlúpsenc (Kamloops) have also developed home ownership programs; whereas Cowichan and Kahnawake developed solutions to improve health and well-being by addressing mold in homes (ISC n.d.).

There are also several Indigenous owned/operated insurance brokers, but no Indigenous-controlled or Indigenous-focused property and casualty insurance providers. TIPI Insurance Partners and TIPI-IMI Insurance Partners is an Indigenous owned insurance brokerage company working with Indigenous communities and organizations. The company customizes their insurance solutions to the complex needs of Indigenous communities, including property and liability insurance that features a community asset program, community services insurance, construction insurance program and Directors and officers' liability program (TIPI n.d.<sup>5</sup>) The Métis Urban Housing Corporation (MUHC) in Alberta invests in housing for low and moderate income Métis families (ATB & MNB 2021). Alberta is the only province with (eight) land-based Métis Settlements. The MUHC provides units in 14 different urban centres, offers subsidized rent for families, and conducts housing renovations. The Métis Capital Housing Corporation (MCHC), operational since 2007, has operated 354 units in 5 Alberta urban centers, provided home rentals for twenty percent lower than the market value through their Affordable Rents program, and also conducted home renos (ATB & MNB 2021:25).

The 2000 Wellman study identified two initiatives: the first was the First Nations Insurance Pool initiated by North Central Insurance Brokers. The second is the Cree Nations Insurance Program for nine communities in Northern Quebec. One First Nation community was also self-insuring through their own insurance "pot", despite the increased riskiness of individual nations providing self-insurance. The AFN Insurance Brokers also offers dwelling insurance to First Nations. According to a Globe and Mail article from 2013 about the Aboriginal Insurances Services Inc., which provides insurance solutions unique to the needs of First Nations, Métis and Inuit

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<sup>5</sup> <https://www.tipionline.ca/property-and-casualty>

communities, insurance companies often do not want to insure houses on reserve because of complicated title arrangements, lack of building codes, heightened fire risk (distance from hydrants), and a suite of other issues including loss history and postal code (Norbury 2013). Furthermore, the cost of insurance premiums is often higher for on-reserve housing, “In Duncan, for example, the cost to insure a home on a reserve can be more than \$300 more per year than for a similar non-reserve house on the other side of the street” (Norbury 2013).

The Nipissing First Nation has also developed its own Risk Management Policy with the stated purpose “to provide guidance on risk management as part of the integrated planning process and ongoing governance activities of Nipissing First Nation, including risk assessments, mitigation plans, and specific business activities that are separately evaluated, managed and monitored.” (Nipissing 2016:1).

The success of multiple brokers offering insurance solutions that address the unique contexts and needs of First Nations validate the market for these products. Several Indigenous-controlled regimes have emerged that open up opportunities for financing at favourable borrowing rates, including the offerings of the First Nations Finance Authority, First Nations banks and trust companies and First Nation Capital Corporations that are capitalized by Indigenous Services Canada, but none exist to underwrite commercial general, property, casualty and life insurance. The lack of any Indigenous-owned property and casualty insurance companies that underwrite policies points to an opportunity worthy of further examination.

## Section Six: Case Studies

There are many causes for financial exclusion and a lack of access to financial institutions by Indigenous people. Buckland, McKay and Reimer (2006) present two case studies of financial exclusion in Manitoba: one in the rural community of the Fisher River Cree Nation (FRCN), and the other in the inner-city of Winnipeg. The authors employ a mixed methodology to examine the views of Indigenous key informants and community members on the causes and consequences of financial exclusion and its relationship to financial literacy in order to understand better approaches for financial inclusion (p.9). The studies employed key informant interviews (n=9), a survey (quantitative and qualitative elements, n=53), a life history (n=10), and participatory research with groups (n=22). The findings varied across the two cases and the authors present the results by method. According to respondents, Indigenous financial exclusion must be placed in the “historical and contemporary consequences of colonialism,” and Indigenous views towards money which include a more collectivist or communal understanding compared to non-Indigenous peoples (p.1-2).

The study found that some people are reluctant to use mainstream financial institutions because of poor treatment by staff, distrust and/or racism; but both financial access *and* literacy need to be improved, not one or the other. Proximity or access to and convenience of banking services – in both rural and urban settings – played a key role in peoples’ use of mainstream versus fringe services; but so did socio-economic well-being, as those in FRCN who were more educated and had higher income and employment rates were more likely to access mainstream institutions (there were no fringe banks, but there were informal services, in the community), while those in inner-city Winnipeg were more likely to access fringe banks (with higher fees). Higher-income individuals may also have more complex banking needs. In the participatory method examining the causes and effects of financial exclusion, the Winnipeg respondents noted the causes as high/complicated bank fees, poor bank locations, lack of access to bank credit, language/cultural barriers, lack of learning, high fringe bank fees, and inaccessibility of financial institutions and electronic services (p. 22). The effects were listed as:

knowing where and when to start with banking, limited options to bank alternatives, receiving cash from cheques with a delay, having less money due to higher fees (fringe), vicious cycle of high fees, low income and reliance on fringe banks; not having a bank account as a barrier to getting a job, unable to become independent, harm to relationships, obstacles to education and training, confusion and depression (21). The report concludes with several solutions for better financial inclusion such as: “integrate Indigenous People’s experiences, goals, and needs into banking; hire, train, and promote Indigenous People as staff within financial institutions; develop appropriate services for low-income/asset people; build ways to foster financial empowerment including around financial literacy education, holistic financial empowerment, build a financial institution from the ground up, and better regulate financial services – particularly fair disclosure of fees and access to basic banking.

The mixed methodology of the report allows the authors to triangulate the insights from different methods increasing the reliability of the results while acknowledging they cannot represent the situation for all Indigenous peoples. It also illustrates that distinct communities have distinct needs, and that approaches for addressing financial exclusion must consider the strengths and challenges of specific communities. In terms of methodology, however, the findings are limited to those two populations; a comparative method with two urban populations and two community populations might make the findings more robust or broadly applicable (or, alternatively, challenge them).

Wilkinson & Paiement (1999) introduces two cases where Aboriginal communities have obtained affordable and comprehensive insurance. The first case includes 14 Inuit communities of the Kativik Regional Government in Nunavik which found an insurance arrangement 50 percent cheaper than its alternative with a reduction of 20 percent two years later. The second case study features the Naskapi Band of Quebec which also sought cheaper insurance, saving 70 percent in costs. The paper cites the reason that coverage for these communities is higher is a lack of familiarity among brokers about the nature and frequency of the risks faced by these communities.

Additionally, there is commonality among these communities about what kind of insurance is available to them which hampers their ability to find the best insurance arrangement. The paper concludes with encouraging Aboriginal organizations to repeat the process of issuing a call for bids every three or four years with their consultant. This can lead to further reductions in cost that may arise with the constant changes in the insurance market. This paper is valuable in that it provides a useful perspective of encouraging consultants and brokers to periodically review bids. It also hints that there are market forces at play for the status quo insurance for Aboriginal communities, which would be an important next step in the research. This paper also points to the need to correct perception of many insurers that the risks are not extraordinarily high in Aboriginal community, and that while markets are competitive in theory, it takes some effort to make it competitive in practice (Wilkinson & Paiement 1999:13).

## Section Seven: Conclusion and Moving Forward

Building on literature published in the 1990s to 2000s (Wellman 2000; Wilkinson & Paiement 1999), as well as looking at a variety of important research studies on a variety of issues that pertain to housing needs, risk and insurance we see that there are many limitations and gaps in knowledge that is available regarding insurance provision for Indigenous housing. Outside of a few select case studies there is a need for attention to be paid to “for-Indigenous and by-Indigenous” initiatives which includes insurance provision on First Nations’ lands, Métis settlement or Inuit regions. This points to the need for further development of “Indigenous-specific” risk analysis models outlining various options for geographic location and product (lending, construction, property).

While there are a relatively small number of local, small-scale solutions that are currently in place, there are very few Indigenous-controlled insurance brokers and no Indigenous-controlled or Indigenous focused property and casualty insurance companies, which makes an assessment of the affordability of insurance for Indigenous housing difficult to ascertain.

Following the literature review our next step is to engage in an Indigenous-led engagement strategy to explore what a “for-Indigenous and by-Indigenous” option could entail. The literature review has helped validate several important research questions which include identifying the geographic and political contexts of these options to further consider the following:

1. How are risks to property assessed and is adequate consideration given to the risks facing Indigenous nations? How are deficiencies in risk information impacting the insurance offerings and premiums for Indigenous nations, corporations, and people.
2. How does elevated exposure and increased vulnerability to natural disasters affect the property insurance needs and access for Indigenous nations and homeowners, and what interplay exists between federal funding programs (e.g., housing, capital, emergency

response and recovery programs) and take-up on property insurance. What are the premiums and deductibles and how is affordability calculated? What are the impacts and indirect/downstream costs of inaccessible property and casualty insurance, and who bears these impacts and costs?

3. What opportunities exist to expand and enhance coverage that is not currently available or affordable?
4. What barriers have some organizations faced when developing a for-Indigenous, by-Indigenous product?

In the next phase of the research, we will provide an analysis of current insurance risk matrices for multi-unit, single, and modular residential projects located on Indigenous territory (including self-insured or local for-Indigenous, by-Indigenous solutions), and challenges related to legislation, environment, supply chain, and the applicability to the Indigenous context. In order to move forward with research, we will engage with a various of Indigenous peoples, and organizations and also seek unput from a variety of key stakeholders (in priority order) to understand the concerns and challenges in underwriting for Indigenous projects:

- Underwriters and Actuaries
- Insurance Bureau of Canada
- Property and Casualty Insurance Compensation Fund (PACIC)'s Chief Risk Officer's forum.
- Canadian Association of Direct Relationship Insurers
- Insurance Broker's Association
- For-Indigenous, by-Indigenous insurers
- And any other insurance providers working in the Indigenous space

Through this engagement process we will provide an approach to diversified insurance provision for various communities of various risk levels and the optimal risk balance for viability

(either at the insurance level or by reinsurance agencies), as well as the identification of areas where CMHC can provide a supportive role. This will enable viable options and recommendations related to a risk assessment model that merges for Indigenous/ by-Indigenous and non-Indigenous insurance provision as well as bridges the risk tolerances of Indigenous housing developers and insurance providers.

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