

As the Provincial President of NLAIRP, I am a signatory to the CAIRP Response and I will not comment further on the matters covered therein.

I would, however, like to endorse the thoughtful and detailed response of Kevin Brennan regarding the submission of CACCS.

He has provided a thorough and balanced analysis of what is clearly a poorly thought out and self-serving document.

Suggesting that there is currently insufficient access to consumer proposals is not supportable and suggesting that credit counsellors are "uniquely qualified" is not credible.. Furthermore, their fundamental misunderstanding of the role of an officer of the court and their failure to realize that they are not equipped to discuss (and deliver) all BIA options to deal with financial problems is of particular concern.

Finally, the conflicts and tensions that will arise with creditors accustomed to DMPs is inevitable and may unduly influence credit counsellors.

Please consider carefully the implications of allowing credit counsellors to administer consumer proposals.

Respectfully submitted,
Ian Penney, CA, CIRP