

## Sample Member Policy Issue

### Member organization:

*Insert the name of your co-operative...*

- BCCA

### Policy issue:

*Provide a short title describing your policy issue, ie 'Co-operative securities exemption'...*

- Co-operative securities exemption

### Background:

*Describe the policy issue facing your co-operative... Describe any previous actions you have taken or communications you have had with government/stakeholders regarding this issue...*

- Securities regulations are necessary to protect investors from misrepresentation and fraud, but should not create administrative and cost burdens that make it too expensive for co-operatives to raise small amounts of capital from their members to support business start-up and expansion and the jobs they create. There is no historical case of securities fraud perpetuated by co-operatives in Canada or BC in the last 30 years.
- The accounting costs necessary to file a registration and prospectus with the Alberta Securities Commission, combined with ongoing legal costs necessary to make changes to filings or offerings, are too high for small co-operatives that require small amounts of capital (less than \$10 million).
- Sections of the Securities Act require applicants to register and file a prospectus or Offering Memorandum with the BC Securities Commission. Co-operatives are member owned organizations and do not have the capital or internal resources required to complete the filings necessary to raise small amounts of investment capital.

### Recommended action:

*Describe what policy change you are proposing to solve the issue...*

- Provide an exemption from in the BC Securities Act for applicants that meet the criteria of a "co-operative" as defined by the BC Co-operatives Act.
- Review the BC Securities Act & Regulation and the BC Securities Commission Rules and Forms for unnecessary red tape such as cost and administrative burdens for job creators and policies that discourage local investment.

### Policy authority:

*List the office(s) of government with jurisdiction/decision-making-power over your policy issue...*

- The BC Ministry of Finance has legislative authority for the BC Securities Act.
- The British Columbia Securities Commission is an agency under the jurisdiction of the Ministry of Finance with regulatory authority to interpret and enforce BC securities legislation.

**Member organization:**

*Insert the name of your co-operative...*

- [Modo Co-operative](#)

**Policy issue:**

*Provide a short title describing your policy issue, ie 'Co-operative securities exemption'...*

- [Equitable access to EV purchase incentives](#)

**Background:**

*Describe the policy issue facing your co-operative... Describe any previous actions you have taken or communications you have had with government/stakeholders regarding this issue...*

- [The BC provincial government and the federal government offer purchase incentives in the form of rebates to buyers of electric vehicles \(EV\). The values are \\$3,000 and \\$5,000 respectively. This \\$8,000 total rebate, in combination with lower costs for power and maintenance, allow the total cost of ownership \(TCO\) for an EV to be competitive with an internal combustion engine \(ICE\) vehicle.](#)
- [The BC government allows any single individual to exercise 10 such rebates in a lifetime. Modó, with its 24,000 users and 12,000 member-owners, is treated for this purpose like any single individual.](#)
- [The federal government allows any single individual to exercise 10 such rebates per year. Again, Modó is treated like any single individual.](#)
- [Modó has approx. 700 vehicles in its fleet, causing the rebates to have very limited value. Without access to the rebates, the TCO for an EV is too high and acts as a significant impediment of fleet conversion away from ICE vehicles.](#)
- [Upon request, the BC government has agreed to lift Modó's lifetime access to 50 rebates. Better but still severely inadequate.](#)
- [A letter to then federal Minister of Transport Marc Garneau \(see attached\) got a friendly but unhelpful reply.](#)
- [A very high percentage of Modó members do not own a car and choose to use those that belong to the co-operative of which they are a member-owner. They are not afforded equitable access to EV incentives in the way that car owners in the more traditional sense are. In a year, 12,000 individual car owners can easily access one rebate each \(total value \\$96 million\) but 12,000 member-owners of a carsharing co-op can collectively access only 10 in total \(total value \\$80,000\).](#)

**Recommended action:**

*Describe what policy change you are proposing to solve the issue...*

- [A "co-operative carsharing exemption" that lifts the cap on the number of provincial and federal EV rebates available to qualified co-op carsharing operators.](#)

**Policy authority:**

*List the office(s) of government with jurisdiction/decision-making-power over your policy issue...*

- [BC Ministry of Energy, Mines and Low Carbon Innovation – Minister Bruce Ralston](#)
- [Transport Canada – Minister Omar Alghabra](#)