



ENVIRONMENTAL & POLLUTION LIABILITY

Overview of Canadian environmental law

A potential for liability and insurance coverage issues



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Since the early '70s, provincial governments have adopted an array of environmental laws and regulations pertaining to the protection or enhancement of the environment. These laws and regulations all give rise to duties and obligations on individuals or companies that cannot be ignored and which, in the event of non-compliance or of an environmental occurrence or incident, can potentially lead to one's liability not only under the environmental laws but also in a civil or common law context. The same can be said also in respect to environmental laws that have been adopted at the federal level.

Without proceeding to an extensive review of all pertinent provisions of federal and provincial environmental laws and regulations in Canada, we wish to provide the reader with an overview of obligations and duties thereunder and potential sources of environmental liability.



Who has jurisdiction over the environment?

The *Constitution Act, 1867* describes which level of government (federal or provincial) can do what within its jurisdiction. However, the founding fathers did not contemplate the environment at the time of preparing the country's constitution and dividing up federal and provincial powers. As a result, legislative and enforcement authority over the environment is split between the federal and provincial governments who have each adopted their own set of rules. The federal government has exclusive jurisdiction over, namely, criminal law, coastal and inland fisheries, navigation, federal works and undertakings and laws for the peace, order and good government of Canada, while provinces have exclusive jurisdiction over property and civil rights as well as all matters of a merely local or private nature. Provinces can also delegate environmental powers to municipalities. As a result of this delegation of power from provinces, many municipalities will regulate matters such as noise, nuisances, pesticides, sewers and land use planning. For instance, the provincial government of Quebec has delegated to the Montreal Metropolitan Community responsibility over air emissions and waste water discharges to the sewer system and watercourses within its territory.



Environmental laws of federal jurisdiction

The main pieces of legislation adopted by the federal government in relation to the environment are the *Canadian Environmental Protection Act, 1999* [“CEPA”], the *Fisheries Act*, the *Transportation of Dangerous Goods Act, 1992*, the *Species at Risk Act*, and the *Canadian Environmental Assessment Act*.

Environmental legislation of provincial jurisdiction

As mentioned at the outset, all provinces and territories have adopted some form of environmental legislation. In Ontario, there is the *Environmental Protection Act*, the *Ontario Water Resources Act*, the *Safe Drinking Water Act*, the *Endangered Species Act* and the *Environmental Assessment Act* that constitute the main body of environmental legislation. The province of Quebec’s main environmental legislation is the *Environment Quality Act* under which a series of regulations have been made pertaining to, namely, hazardous materials, biomedical wastes, residual materials, the quality of the atmosphere and contaminated sites, while Alberta has the *Environmental Protection and Enhancement Act*, British Columbia, the *Environmental Management Act*, Nova Scotia, the *Environment Act* and New Brunswick, the *Clean Environment Act*.

All of these acts and those adopted by other provinces and territories are dedicated to the protection of the environment particularly in a context of sustainable development. The “environment” or the “natural environment” is generally defined under these laws as meaning air, land, water (including ground water) and all other external conditions or influences under which humans, animals and plants live or are developed or have dynamic relations. A “contaminant” is defined in general as meaning any solid, liquid, gas, odour, heat, sound, vibration, radiation or combination of any of them resulting directly or indirectly from human activities.

The importance of environmental laws has been regularly recognized by all levels of our courts, including the Supreme Court of Canada.

Importance of environmental laws and regulations

The Supreme Court of Canada, in the case of *Imperial Oil Limited v. Quebec (Minister of the Environment)*¹ stated the following comment with respect to Quebec's *Environment Quality Act* that can easily apply to any other environmental legislation in Canada. The Supreme Court of Canada thus observed that the *Environment Quality Act*:

“... reflects the growing concern on the part of legislatures and of society about the safeguarding of the environment. That concern does not reflect only the collective desire to protect it in the interest of the people who live and work in it, and exploit its resources, today. It may also be evidence of an emerging sense of inter-generational solidarity and acknowledgment of an environmental debt to humanity and to the world of tomorrow ...”

Alluding to the polluter-pay principle, the Supreme Court of Canada in that case reminded that the principle had become firmly entrenched in environmental law in Canada, namely to encourage sustainable development and that, accordingly, the principle assigns polluters the responsibility for remedying contamination for which they are responsible and imposes on them the direct and immediate cost of pollution. At the same time, polluters are asked to pay more attention to the need to protect eco-systems in the course of their economic activities.

In the context, for instance, of real estate transactions, contaminated real estate can affect:

1. **the vendor** of the property who cannot escape liability for property contamination by simply selling the property
2. **the purchaser** who may not only become the owner of a piece of land, but also the party responsible for cleanup of all previous historical contamination problems
3. **a tenant** whose lease obligation “to keep in good repair” could mean responsibility for expensive remediation of soil and ground water contaminated by industrial practices formerly considered acceptable and benign
4. **the landlord** of contaminated property with tenants in receivership or otherwise judgment-proof, who can become responsible for property cleanup
5. **banks, trusts and insurance companies** who may refuse to advance funds or renew mortgages unless a property is proven “clean”
6. **the developer** who could find itself frustrated by the registration against an immoveable property of a contamination notice or other type of warning of contamination
7. **the director or officer** of a company who may personally become liable for the cost of remediating contamination caused by present or prior owners
8. **the real estate agent** who can be held liable in negligence for failure to conduct a competent property inspection or the **vendor's agent** for failure to verify vendor's representations
9. **the solicitor** for failing to take appropriate measures to determine whether property is free of contamination, **contractors** who during their work or use of their equipment may have contaminated the property, and, finally
10. **municipalities, or even provincial and federal departments**, for providing misleading information about property contamination or, in some cases, for failure to properly inspect such properties and require remediation prior to its use²

What are the obligations under environmental laws?

As mentioned at the outset, environmental laws in Canada generally establish, on the one hand, duties in respect to protecting the quality of the environment and, on the other hand, obligations associated with permits and approvals that allow impacts to the environment, but in a controlled and regulated fashion.

Generally, environmental laws create a prohibition against contaminating the environment. The failure to comply

with this duty can give rise not only to penal sanctions and administrative orders, but can also potentially give rise to the obligation to cleanup any damages caused to the environment as a result of their acts or omissions or to liability of the offender towards third parties. In this regard, the Supreme Court of Canada in the case of *Morin v. Blais*³ established the principle that the failure to comply with a statutory or regulatory obligation can give rise to civil or common law liability if it is established that a damage

was caused directly and simultaneously as a result of the non-compliant act or omission. Thus, in a context where a person violates an obligation under an environmental law and that a damage is caused as a direct result of this violation (example: discharge of a contaminant, the presence of which is prohibited in the environment, that impacts someone's potable water well and renders it unusable) could give rise to civil litigation by the person having suffered the damage.



Ontario

Ontario's *Environmental Protection Act* provides for general and specific prohibitions and requirements. For instance, section 6 provides that no person shall discharge into the natural environment any contaminant, and no person responsible for a source of contaminant shall permit the discharge into the natural environment of any contaminant from the source of contaminant, in an amount, concentration or level in excess of that prescribed by regulation.

Under section 8 of the same Act, if the Director, upon reasonable and probable grounds, is of the opinion that a source of contaminant is discharging into the natural environment which constitutes an immediate danger to human life, the health of any persons, or to property, he may then issue a stop order as well as a cleanup order directed to an owner or previous owner of the source of contaminant, a person who is or was in occupation of the source of contaminant, or a person who has or had the charge, management or control of the source of contaminant.

Under section 9 of the *Environmental Protection Act*, a person wishing to construct, alter, extend or replace any plant, structure, equipment, apparatus, mechanism or other thing that may discharge or from which may be discharged a contaminant into any part of the natural environment (other than water, which is under the jurisdiction of the *Ontario Water Resources Act*) or wishes to alter a process or rate of production with the result that a contaminant may be discharged into any part of the natural environment must first obtain a certificate of approval. The failure to obtain a certificate of approval or to comply with the conditions set forth in a certificate of approval can lead to sanctions under the Act as well as stop orders or, as the case may be, cleanup or remediation orders. Directors' and officers' personal liability can also be sought under the Act.

Section 194 of the Act states the obligations on every director or officer of the corporation to take all reasonable care to prevent the corporation from contravening the Act. A similar obligation also exists under the *Ontario Water Resources Act*.





Quebec

The Quebec *Environment Quality Act* contains very similar obligations and duties. For example, it is prohibited, under section 20 of the Act to emit, deposit, issue or discharge or allow the emission, deposit, issuance or discharge into the environment of a contaminant in a greater quantity or concentration than that provided by regulation. The same prohibition applies in respect to a contaminant the presence of which in the environment is prohibited by regulation or that is likely to affect the life, health, safety, welfare or comfort of human beings, or to cause damage to or otherwise impair the quality of the soil, vegetation, wildlife or property. Although this prohibition may appear to be very broad, such language was recognized by the Supreme Court of Canada as being appropriate in the context of protecting the environment as stated in the case of *Ontario v. Canadian Pacific Ltd.* in 1995.⁴

Similar to its Ontario counterpart, section 22 of the *Environment Quality Act* states that no one may erect or alter a structure, undertake to operate an industry, carry on an activity or use an industrial process or increase the production of any goods or services if it seems likely that this will result in an emission, deposit, issuance or discharge of contaminants into the environment or a change in the quality of the environment, unless the person first obtains a certificate of authorization from the Minister of Sustainable Development, Environment and Parks.

Directors' and officers' personal liability is also contemplated under the Act as we shall see hereunder besides the powers granted to the Minister to issue cleanup, remediation or stop orders in case of emergencies or to claim the costs incurred by the Ministry of Sustainable Development, Environment and Parks to contain, stop and remove contaminants and rehabilitate the environment against the person having caused the contamination or having the care and custody of the contaminants having impacted the environment.

Alberta

The purpose of Alberta's *Environmental Protection and Enhancement Act* is to support and promote the protection, enhancement and wise use of the environment while balancing economic growth and prosperity. Sections 108 and 109 of this Act provide that no person shall release or permit the release, knowingly or otherwise, of a substance, if it is in excess of an amount set out in an approval, a code of practice or the regulations made under the Act, or that causes or may cause a significant adverse effect. Section 155 of the Act also provides that a person who keeps, stores or transports a hazardous substance or pesticide shall ensure that it does not come into direct or indirect contact with or contaminate any animals, plants, food or drink. Similarly as under the Ontario and Quebec legislation, environmental protection orders in the case of a release of a contaminant can be issued or in cases where emergency measures must be taken or in cases involving contaminated sites.

The *Storage Tank System Management Regulation* grants the power to the Petroleum Tank Management Association of Alberta to receive notification that soil is contaminated where underground tanks have been removed and to accept the manner of removing, treating or replacing soil in accordance with the obligations set forth under the *Alberta Fire Code*.



British Columbia

Under British Columbia's *Environmental Management Act* and its regulations, except for specific exemptions, no contaminant or waste product can be discharged into the environment except as allowed by a permit or approval. If a corporation commits an offence under the Act, an employee, officer, director or agent of the corporation who authorized, permitted or acquiesced in the offence also commits the offence whether or not the corporation is convicted. In respect to contaminated sites, the Act states that a person who is responsible for remediation of a contaminated site is "absolutely, retroactively and joint and severally liable to any person or government body for the reasonably incurred costs of remediation" of the site.

New Brunswick

The *Clean Environment Act* of New Brunswick also provides that no person shall release any contaminant or waste or any class of contaminant or waste into or upon the environment or any part thereof if such action or occurrence would or could affect the natural, physical, chemical or biological quality or constitution of the environment, endanger the health, safety or comfort of a person or the health of animal life, cause damage to property or plant life, or interfere with visibility, the normal conduct of transport or business or the normal enjoyment of life or property, unless that person acts under and in compliance with an authorization or permit.

The Act also defines the notion of “danger of pollution” which is broadly defined as meaning “any accumulation of material at a particular location, any artificial disturbance of land, any material storage or disposal facility any transfer operation, any transport facility, any pipeline, tank, drum, excavation, depression, pond or impoundment situated in or on the ground or

in buildings, whether natural or artificial and whether lined or unlined, for either storage or transport, as the case may be, of useful or waste materials that could through use or misuse, seepage, leaching, accidents, leaks, breaks, negligence, acts of animals or persons or acts of God, release contaminants into or upon the waters of the Province and any application or disposal of materials or chemicals into or upon the environment.”

As an example of regulations made under the *Clean Environment Act*, consideration should be given to the *Petroleum Product Storage and Handling Regulation – Clean Environment Act* that applies to the storage, handling and use of classified petroleum products, to above ground and underground storage tank systems, portable containers or pre-packaged containers used to store or carry petroleum products, to bulk plants, marinas, transfer facilities and dispensing units, as well as to, namely, the construction, alteration, modification, operation, repair, monitoring, testing, inspection, removal and disposal of

storage tank systems. A person responsible for a storage tank system who is aware of a leak or possible leak of a petroleum product has the duty to notify the authorities and, among other things, take all steps reasonable to prevent further leakage and recover escaped petroleum product and remove product-contaminated soil before installing a replacement tank or line. The Minister under the Regulation also has the power, when informed of leak or possible leak, or at any other time, to order the excavation of the storage system, its modification, its inspection, its testing, its replacement or that contaminated soil be removed or water decontaminated.

As we can see from the few examples provided above, environmental laws have a wide reach and important powers when it comes to protecting or rehabilitating the environment. However, the protection and rehabilitation of the environment is not limited to the sole context of statutory liability where the main actor is a governmental authority. Recourses by third parties must also be considered.



Environmental liability in a common law or civil law context

One should not neglect the general common law or civil law principles of damages resulting from non-compliance with environmental laws or from nuisances that can be caused by an activity and principally from an industrial or commercial activity (or, under the *Civil Code of Quebec*, from neighbourhood annoyances that exceed what is normally tolerable) as illustrated in the judgment of the Supreme Court of Canada rendered in the autumn of 2008 in the case of *St. Lawrence Cement Inc. v. Barette*.⁵ Although that case was decided in a Quebec civil law context and that the Supreme Court of Canada concluded to the existence of no-fault responsibility where there is a breach of the obligation towards neighbours established under article 976 of the *Civil Code of Quebec*, it is reasonable to consider that the principle set forth by the Supreme Court of Canada in that case could apply in any other common law jurisdiction in the context of a nuisance action. In fact, in its analysis of the notion of neighbourhood annoyances, the Supreme Court of Canada compared the Quebec situation under article 976 of the *Civil Code of Quebec* with the notion of nuisance under common law and concluded that the principles were very similar thereby paving the way to similar recourses before common law courts.

In that case, a class action in damages was instituted against Ciment du Saint-Laurent Inc. by a group of neighbours affected by noise, dust and odours generated by the cement plant operated by the company which, they asserted, exceeded what was normally tolerable.

Notwithstanding that the company had appropriate environmental permits, had incurred significant costs to install air emission abatement equipment and that, in the court's opinion, it had not committed any fault in its operations, the court nonetheless decided that the annoyances caused by the plant exceeded what was normally tolerable and concluded that the principle set forth in article 976 of the *Civil Code of Quebec* created a no-fault liability regime. The company was thus held liable for damages amounting to over \$15 million.

Other sources of potential environmental liability or obligations

Besides the above-considered environmental laws, there exists also other sources of environmental obligations that do not necessarily fall under the jurisdiction of federal or provincial ministries of environment.

For example, above ground and underground petroleum storage systems in Quebec, are, since 2007, under the jurisdiction of the Building Board (Régie du bâtiment) following amendments made to the *Building Act* and the *Construction Code* and *Safety Code* made thereunder whereby jurisdiction over petroleum installations was transferred from the Ministry of Natural Resources and Wildlife to the Building Board. The *Construction Code* and *Safety Code* thus set forth the regulatory obligations pertaining to the installation, use and removal or decommissioning of petroleum installations and, in particular, high-risk petroleum installations that include namely underground storage tanks and large volume above ground storage tanks used to store petroleum products.

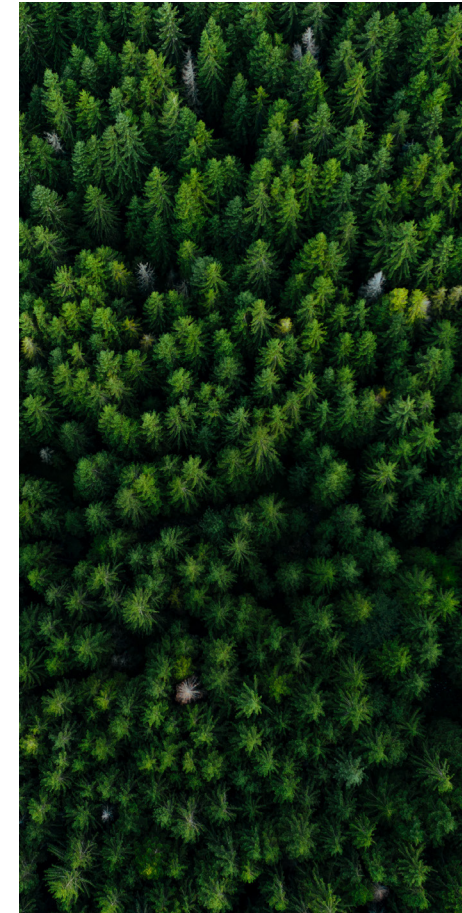
In Ontario, petroleum installations are covered by the *Technical Standards and Safety Act, 2000* administered by the Ministry of Consumer and Business Services through the Technical Standards and Safety Authority (TSSA), and its regulations. Under this scheme, the *Liquid Fuels Handling Code* requires secondary containment for fuel storage tanks and testing requirements of a tank during and after installation as well as contamination cleanup requirements.

Mining activities constitute another sector where site reclamation obligations exist and may give rise to environmental liabilities. For example, under the Quebec *Mining Act*, the owner or operator of a mine must provide

the Minister of Natural Resources and Wildlife with a mine restoration and rehabilitation plan for when the mine will cease its operations so as not only to restore the site but to ensure that mine tailings will not cause any damages to the environment. Appropriate guarantees will also have to be provided to ensure that the closure obligations will be met in case the owner or operator fails to meet its obligations.

Such guarantees or insurance coverage requirements are not uncommon. For instance, under the Quebec *Regulation respecting hazardous materials*, a person wishing to use used oils as a source of energy in accordance with the applicable provisions of said regulation must provide a guarantee in the form of an insurance policy or other form of guarantee set forth under the regulation in order to ensure that all requirements and obligations provided for under the *Environment Quality Act* will be met during operations and upon ceasing operations.

In the case of the transportation of hazardous waste, the federal *Export and Import of Hazardous Waste Regulations* made under CEPA that applies to both hazardous waste and hazardous materials destined for recycling provides that the exporter and the carrier must be insured. The insurance coverage must amount to no less than \$5 million for exporters and importers, while for carriers the amount of insurance coverage must be in accordance with the law of the country in which the waste is to be carried. The insurance must respond to third party damage claims, as well as for costs that could potentially be claimed or imposed by law upon the exporter, importer or carrier to cleanup a hazardous waste spill.



Who is at risk?

We have seen that some environmental laws and regulations will require specific guarantees in relation to carrying on certain activities, namely through appropriate insurance coverage, to ensure compliance with applicable statutory or regulatory obligations or requirements.

However, in our view, there are numerous situations or factors arising as a result of the application of environmental laws that are likely to apply in an insurance context. In this regard, the following examples of activities falling under either applicable federal or provincial (or municipal) environmental provisions provide a good idea of those “environmental risks” of interest because of the potential risks that they represent for the environment:

1. ownership and operation of petroleum products storage tanks and installations, the handling of petroleum products and their transportation
2. manufacturing, producing, storing, handling, treating, recycling or eliminating hazardous materials (such as chemicals)
3. operation of a manufacturing establishment that generates air emissions, odours, noise, hazardous wastes, waste water discharges and involves the storage of hazardous materials or substances
4. contaminated land from which contaminants can migrate off-site and impact adjacent lands, watercourses or sources of potable water
5. mining activities and mine reclamation activities
6. transportation of dangerous goods or hazardous substances
7. hazardous waste storage, treatment, recycling or disposal facilities
8. landfill sites
9. waste transfer centres and waste storage, recycling, treatment and reclamation facilities
10. environmental consulting and remediation

All of these activities present risks which, if they occur, can impact the environment and those who are nearby. In the case of *Candiac (Ville de) c. Locweld Inc.*,⁶ the City of Candiac sued Locweld Inc. for damages caused to its sewer system by corrosive wastes discharged by the company that had seriously corroded the system’s pipes which had to be replaced at a significant cost for the City. Although at the time the damages occurred there were no specific environmental provisions pertaining to the situation, today the *Regulation respecting hazardous materials* made under the Quebec *Environment Quality Act* specifically prohibits the emission, deposit, release or discharge of a hazardous material into a sewer system.



Directors' and officers' liability

As mentioned earlier in this text, all environmental laws contain provisions aimed at directors and officers whose corporation has contravened the law. At the federal level, both the *Canadian Environmental Protection Act, 1999* (the "CEPA") and the *Fisheries Act* provide for significant fines in the case of an offence under those acts, together with directors' and officers' personal liability. Violations under CEPA pertain mainly to the communication to federal authorities of false or misleading information or the failure to communicate information required to be submitted under the Act, the failure to comply with ministerial orders or the omission to report the discharge of a contaminant to the environment and to take necessary emergency measures in such circumstances. Fines under CEPA can reach \$1 million and imprisonment can also be imposed for up to three years. Section 280 of CEPA provides that where a corporation commits an offence under that Act, any officer, director or agent of the corporation who directed, authorized, assented to, acquiesced in or participated in the commission of the offence is a party to and guilty of the offence, and is liable to the punishment provided for the offence.

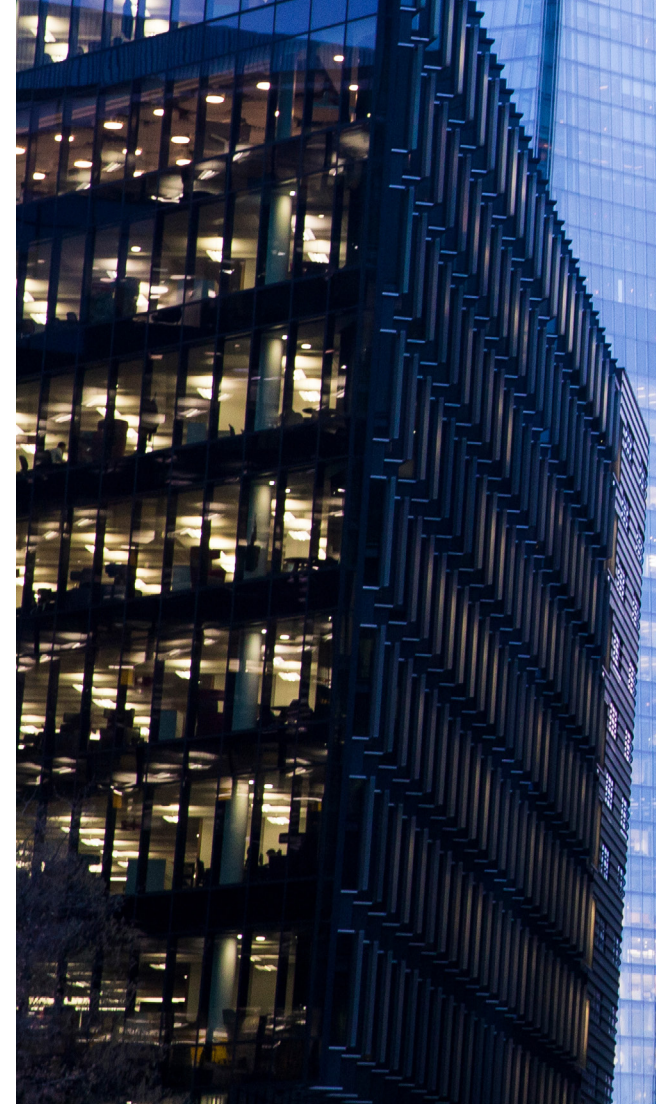
Under the *Fisheries Act*, directors and officers can be held personally liable when there is a discharge of a deleterious substance in water frequented by fish or in any other area where there is a risk that the deleterious substance reach waters frequented by fish. Here also, the Act provides for fines of up to \$1 million and directors and officers can face a maximum imprisonment of three years. In 2004, the Ontario Court of Appeal in the case of *R. v. Kingston (Corp. of the City)*,⁷ confirmed the conviction of both the City of Kingston and one of its employees under the *Fisheries Act* after leachate from a former dumpsite seeped into the Cataraqui River. The court affirmed a "zero-tolerance" approach when it comes to an illegal discharge of a deleterious substance into waters frequented by fish as contemplated under the Act and that all which matters was the nature of the substance (i.e., was it "deleterious") that was deposited and not the actual effects the substance could have on fish.

Under provincial legislation, directors and officers can face personal liability for the corporation's contamination of the environment, although the corporation may not necessarily be prosecuted or convicted. The failure of a corporation to obtain necessary statutory approvals or permits required under the applicable environmental legislation or the failure to report an environmental incident can give rise to directors' and officers' personal liability. They can also be prosecuted for the failure to take all reasonable care to prevent the corporation from causing or permitting unlawful discharges of contaminants or for

the failure of the corporation to comply with an order such as a cleanup order. Directors and officers can also be held personally liable for the costs of remediating both historical and current contamination affecting property that the corporation owns, controls or occupies or formerly owned or controlled.

For example, in the case of *R. v. Shamrock Chemicals Ltd.*,⁸ both the corporation and its sole director were charged with discharging contaminated water contrary to the *Ontario Water Resources Act* and with failing to implement the regulator's order to file a hydrogeological report and remedial action plan with the Ministry of the Environment contrary to the *Environmental Protection Act*. Both the corporation and its director were convicted and fined. They appealed the decision, but the Court of Appeal held that there was nothing improper about convicting of the same offence both a corporation and the individual who, as was established in evidence, is its directing mind.⁹

Section 109.3 of the Quebec *Environment Quality Act* provides that every director or officer of a legal person who, by means of an order or authorization or through his advice and encouragement, leads the corporation to refuse or neglect to comply with an order or to emit, deposit, release or discharge a contaminant into the environment, in contravention of the said Act or its regulations, commits an offence. Similar provisions can be found in the *Environmental Management Act* of British Columbia, Manitoba's *Environment Act*, Alberta's *Environmental Protection and Enhancement Act*, Nova Scotia's *Environment Act* and Prince Edward Island's *Environmental Protection Act*.



Endnotes

- [1](#) *Imperial Oil Limited v. Quebec (Minister of the Environment)*, [2003] 2 S.C.R. 264.
- [2](#) David Estrin, *Business Guide to Environmental Law*, Carswell, paragraph 1.1.
- [3](#) *Morin v. Blais*, [1977] 1 S.C.R. 570.
- [4](#) *Ontario v. Canadian Pacific Ltd.*, [1995] 2 S.R.C. 1031.
- [5](#) *St. Lawrence Cement Inc. v. Barette*, [2008] S.C.C. 64.
- [6](#) *Candiac (Ville de) c. Locweld Inc.*, [1995] R.J.Q 2886 (Qué. S.C.), settled out of Court in appeal.
- [7](#) *R. v. Kingston (Corp. of the City)*, [2004], 187 O.C.A. 143.
- [8](#) *R. v. Shamrock Chemicals Ltd.*, [1989] 4 C.E.L.R., (N.S.) 315.
- [9](#) David Estrin, *Business Guide to Environmental Law*, Carswell, page 2-6.

Conclusion

As demonstrated by the information and examples provided above, environmental legislation throughout Canada gives rise to significant duties and obligations on persons and corporations. The objective of this article is to alert the reader to the importance and breadth of such environmental laws across Canada and to raise the reader's awareness as to the potential consequences that may result from a failure to comply with such laws. It is always advisable to seek specific advice before embarking on a specific project that may require environmental permits or approvals or with respect to situations involving an environmental spill or other pollution event that may give rise to specific reporting requirements and third party liability.

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