The
CHAMBER.

June 16, 2025

The Honourable Doug Downey
Attorney General of Ontario
Ministry of the Attorney General
McMurtry-Scott Building
720 Bay Street, 11th Floor
Toronto, Ontario, M7A 2S9
Via email: Doug.Downey@ontario.ca

Dear Attorney General Downey,

Re: Urgent Concerns from the Timmins Business Community Regarding Proposed Reforms to the Rules of Civil Procedure

On behalf of the Board of Directors and our 650 business members in the Timmins area, the Timmins Chamber of Commerce is writing to express strong concerns about the proposed reforms to Ontario's Rules of Civil Procedure. While we support efforts to improve efficiency in the civil justice system, the current proposals risk undermining access to justice for small businesses, legal professionals, and regional communities like ours in Northern Ontario.

Small and medium businesses depend on the civil justice system to address a broad range of issues including employment issues, personal injury claims, trespassing, libel, shareholder disputes, construction liens, and breach of contract issues. It is essential that any reforms to civil processes strikes the right balance between efficiency and access, ensuring that all Ontarians, regardless of location or resources, can fairly resolve disputes.

We are particularly concerned with the proposed shift to an "evidence-first" model, which would require parties to compile their full case immediately after filing a claim. This change would dramatically increase the cost and complexity of initiating a claim, potentially forcing small businesses to forgo their legal rights due to financial constraints. Likewise, the proposed elimination of oral discovery, to be replaced with sworn witness statements, introduces a more formal and expensive process that may be inaccessible to many parties, as it requires sophisticated legal interpretation and preparation.

These structural changes are especially troubling in light of current economic realities. Many businesses in our region are still recovering from the financial aftershocks of the pandemic, burdened by high debt levels, rising operational costs, and persistent uncertainty. Adding costly procedural obligations to the legal system will disproportionately disadvantage Northern Ontario businesses, many of which already face barriers to accessing legal expertise due to geography and limited resources. These changes risk devastating local legal ecosystems, leading to a significant reduction in demand for services provided by small law firms, court reporters, process servers, and other legal support professionals, and potentially forcing closures and job losses.

We urge the Ministry of the Attorney General and the Rules of Civil Procedure Working Group to approach this reform process through a broader lens, one that accounts for both the economic and regional realities of communities like ours.

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We call on the provincial government and working group to:

- Extend the consultation period to at least 12 months, during which an independent, data-driven analysis should be undertaken, alongside engaging both legal professionals and non-lawyers from all regions and practice areas;
- Pilot any significant procedural changes in select jurisdictions;
- Increase judicial appointments (including of Associate Justices) and court funding before overhauling procedures.
- Conduct a regional impact assessment to examine the specific effects of these reforms on Northern Ontario and other rural and remote communities; and
- Assess the direct and indirect impacts on the broader business community supporting the civil justice system, including law firms, court reporting companies, and legal service providers.

The Timmins Chamber remains committed to working collaboratively with government and legal stakeholders to find practical, data-driven reforms that improve the civil system without creating undue hardship for small businesses and legal professionals. We respectfully request that the concerns outlined above be given serious consideration before moving forward with any structural changes that ensures reforms enhance, rather than hinder, access to justice. We would welcome the opportunity to participate in further consultations to support a more equitable path forward.

Yours sincerely,

Tom Faught Jr.,
President
Timmins Chamber

Keitha Robson
Chief Administrative Officer
Timmins Chamber

Cc:
The Honourable George Pirie, Minister of Northern Economic Development and Growth, Timmins MPP
The Honourable Justice Cary Boswell, Ontario Superior Court of Justice, Co-Chair, Civil Rules Review Working Group
Allison Speigel, Speigel Nichols Fox LLP, Co-Chair, Civil Rules Review Working Group
Jennifer Smart, Ministry of the Attorney General, Court Services Division