# NCLA NEWSLETTER

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## Inside This Issue



## Regulatory Offences: The Rarity of a Jail Sentence is No Reason Not to Order It (and other nuggets from the Court of Appeal for Ontario)

By: Bruce McMeekin, *L.S.O. C.S (Environmental Law)*

A month after the Court of Appeal for Ontario ("CAO") re-affirmed deterrence as the primary sentencing factor for regulatory offences, the Court released a decision that details the interplay of deterrence with proportionality and other sentencing factors. In the result, the CAO has provided an instructive judgment that behooves the attention of those litigating regulatory offences.

In *Ontario (Labour) v. New Mex Canada Inc.*, 2019 ONCA 30 (CanLII), the company and two of its directors pleaded guilty to charges under the *Occupational Health and Safety Act* as a result of a 2013 workplace fatality. An epileptic worker, working without training and fall arrest protection on an elevated order picker at a height of 12 feet, suffered a seizure and fell head first onto the workplace floor. He died at the scene. Having suffered seizures in the workplace on two previous occasions, the employer knew the worker suffered from epilepsy. The sentencing justice described the circumstances as showing the highest level of negligence.

In the contested sentencing hearing, the Crown submitted that the employer should be fined at least $100,000 and the directors jailed between 15 and 30 days. The employer was a small, closely held corporation in precarious financial health. The individual defendants argued that if they were fined, it would be tantamount to a double fine, because they would also be required to pay the fines levied against the corporation.

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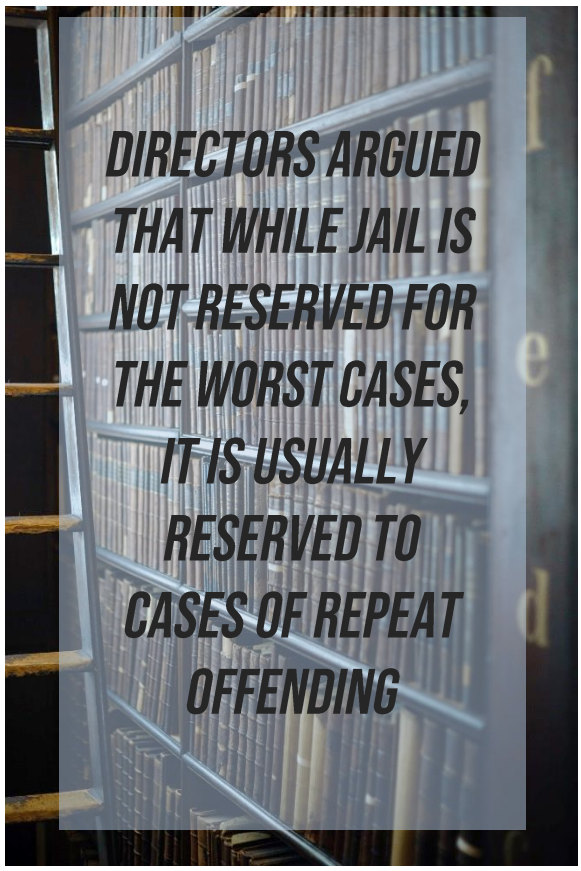
Moreover, none of the defendants were repeat offenders. Consequently, they sought lower fines and no jail time. As to the latter, the directors argued that while jail is not reserved for the worst cases, it is usually reserved to cases of repeat offending, no guilty plea and no remorse.

The presiding justice of the peace fined the employer $250,000 and jailed the directors 25 days to be served intermittently. The justice indicated that she was jailing the directors because to levy fines against them personally would only cause them more financial hardship.

On the defendants' appeal to the Ontario Court of Justice, Bovard J. allowed the appeals, reduced the fines imposed on the employer from $250,000 to $50,000, set aside the jail sentences and instead fined the directors $15,000 each. He concluded that the sentences imposed by the justice were substantially outside the usual range for like offences committed by like offenders and were therefore demonstrably unfit. In addition, she had erred in imposing jail terms as an alternative to fines because the latter would create more financial hardship. She also failed to recognize that jail sentences are more appropriate for repeat offenders who have failed to be deterred by fines. He agreed with the justice that the employer had "demonstrated a very concerning lack of care for its employees", but the sentencing objective in regulatory offences is deterrence, not punishing moral blameworthiness. He added that the defendants had complied with all required remedial orders issued after the employee's death.

On the Crown's appeal to the CAO, Paciocco J.A. writing for the Court found that Bovard J.: (1) did not err in finding that the sentencing justice erred in sentencing the directors to jail terms because fines would be unduly harsh; (2) did err in finding that jail sentences were *per se* unavailable for first offenders who had merely been negligent and not more at fault; and, (3) did not err in finding the fines levied against the employer were demonstrably unfit.

Despite finding (2), the Court declined to vary the directors' sentences. Bovard J. was within his authority to set aside the jail sentences imposed by the trial justice. She had erred in finding that jail could be imposed to avoid the personal hardship in paying fines and this error affected her decision to order jail time. However, Paciocco J.A. observed that, in the circumstances at the time of sentencing, the jail sentences were fit and preferable to the modest fines imposed by Bovard J. The directors were "blithely ignorant" of their obligations to ensure the safety of their workers. Had the trial justice not erred by relying on the financial burden of fines to justify the jail sentences, he would have found that Bovard J. erred in finding the jail sentences demonstrably unfit. Despite the "outrageous" circumstances surrounding the fatality he declined to re-impose the jail sentences because of fresh evidence filed on consent in the appeal documenting recent and ongoing negative personal circumstances for both directors. In addition, the fines levied against all the three defendants, although lenient, constituted a sufficient deterrent and were not disproportionate to the gravity of the offences.

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Ten takeaways:

(1) The standard of review in sentencing appeals is governed by s.122 of the *Provincial Offences Act* and its interpretation by the CAO in *R. v. Cotton Felts* (1982), 2 C.C.C. (3d) 287: the appeal court is obligated to form its own opinion about the sentence under appeal and to vary it if the court does not consider it fit. *Cotton Felts* may have been overtaken by the narrower scope for appellate intervention adopted for criminal proceedings in *R. v. Lacasse*, [2015] 3 S.C.R. 1089: an appeal court may not vary a sentence unless the sentencing judge has erred in law or principle impacting the sentence on appeal or the sentence is demonstrably unfit. Paciocco J.A. declined to decide the issue on the record before the court, but observed with approval that Bovard J. found that mere unfitness was not enough to justify intervention (paragraphs 38 to 47);

(2) Demonstrable unfitness means a substantial and marked departure from parity sentences; that is, sentences customarily imposed for similar offenders committing similar offences. Justices that impose sentences that depart from parity should explain, based on sentencing principles, why the departure is required (paragraphs 47 and 108);

(3) Hardship in paying fines does not justify a jail term as an alternative. Paciocco J.A. referred to *R. v. Wu*, [2003] 2 S.C.R. 530, and the Court's finding therein that inability to pay a fine is not a proper basis for imprisonment. As a matter of principle, he found that the same must be true as to hardship (paragraphs 54 to 57);

(4) Although deterrence is the primary sentencing factor for regulatory offences, that does not mean moral blameworthiness plays no role. Referring to the CAO's decision in *Cotton Felts*, Paciocco J.A. found that regulatory offences have a moral dimension in the sense that offences that threaten the public interest need to be condemned. Sentencing should be tailored to promoting deterrence and condemnation, the point being with the latter that those with guiltier minds deserve or require greater punishment (paragraphs 60 to 65):

(5) Proportionality also invites considerations of moral blameworthiness: the greater the guilt for the commission of an offence, the greater the offender's responsibility, requiring greater punishment (paragraphs 66 to 69):

(6) As a matter of policy in sentencing first time offenders, it is incumbent on the courts to exercise restraint. Where proportionality permits, the Courts should first explore non-custodial dispositions that promote specific deterrence and rehabilitation. That is because custodial sentences may criminalize first offenders. The policy may be of less concern in regulatory proceedings, because the custodial periods ordered are usually shorter and regulatory convictions carry less stigma than criminal. Moreover, deterrence, as the primary sentencing factor, should not be undercut by overemphasizing specific deterrence or rehabilitation (paragraphs 76 to 83):

(7) The rarity of jail sentences for first time offenders is an observation, not a principle. Fines are the more frequent sanction in regulatory proceedings because they are usually sufficient to obtain deterrence. The general principles of restraint and parity also tend to foster non-custodial dispositions. But, as this case demonstrates, jail for first time offenders is fit when deterrence and proportionality require it (paragraphs 84 to 87):

(8) Fines imposed against a corporation are distinct from fines levied against its directors and should not be treated as fines imposed on the latter. Directors are under no obligation to pay fines levied against the latter (paragraphs 90 to 94):

(9) Following the decision of the CAO in *Ontario (Labour) v. Flex-N-Gate Canada Company* (2014), 119 O.R. (3d) 1, compliance with post-offence remedial orders should not be considered a mitigating factor in sentencing (paragraph 95); and,

(10) A fit sentence for regulatory offences is one that obtains general and specific deterrence and is otherwise appropriate, mindful of the principles of sentencing, including proportionality and parity (paragraph 102).

# What Rugby Teaches You About Law

By: Nathan Baker, *Nathan Baker Law*

For anyone considering a career in law, I recommend taking a run out on the rugby pitch first.

## Dealing with the Other Side

Rugby is said to be the sport of ruffians, played by gentlemen. During the game, you have to be ready to fight, put your body on the line and represent your side to the best of your ability or risk getting hurt. You push, hit and generally do whatever you can within the bounds of the laws of the game to get to victory. On the field, you need to be ready for a fight. However, once the game ends, so too should any animosity to your opponent. What happens on the pitch stays on the pitch. So too in law, matters fought in court, often quite vociferously, should be left there. Opposing counsel is not the enemy but a fellow member of the profession. Lawyers could learn a lot from the civility of rugby players who can wage war at one moment but enjoy each others' company a moment later.

## Decisions of Law and Fact

There are no rules in rugby, only laws. Anyone who has taken a Level 1 referee course from World Rugby gets told this. The referee is the final arbiter of fact and law. They determine both what happened and through what lens the laws will be applied. This is a key concept lawyers learn when they end up in their first trial. In a judge alone trial, the judge, like the referee, is the final decider of both. However, in a judge and jury trial, the jury decides the facts and the judge decides the law. The jury then has to apply the law to the facts to come to a final decision. Understanding the difference between what happened, and how it is interpreted, is key for a lawyer.

## Respect for the Decision

A rugby player learns to respect the decision of the referee. There is no talking back to a referee in rugby without a penalty quickly coming.

As famed referee Nigel Owens says "this is not soccer." Just as a lawyer can dislike and disagree with a judge's decision, they need to respect it nonetheless. The only difference is that many rugby players wish there was a way to appeal a referee's decision like there is in law.

## Equitable remedy

No two referees see the game or apply the law in exactly the same way just as no two judges do. While there is a lot of work to standardize application of the law to make things as similar as possible, the circumstances of the offence and the offender will always have some impact. The ability to understand that the application of law is not merely a formulaic process but considers the equities of a particular situation.

## Evolution of the Law

The law is not static. Unlike rules, which are set in stone, a law is open to interpretation. As times change, the interpretation of the law can evolve to allow for a more harmonious view to current situations. Laws do not need to be re-written as often when their interpretation and application can be viewed through a different lens over time. Just as interpretations of what is a safe tackle (or rather not a dangerous tackle) has changes, the views of certain crimes and torts has changed with progress.

## Cutting Legal Aid Funding – Who Should Care?

By: Lois Cromarty, *Northumberland Community Legal Centre*

The Provincial budget of April 11, 2019, calls for a 30% cut to Legal Aid funding in Ontario - $130 Million this year, increasing to $164 Million by 2012-2022.

The public may be paying no attention to a cut to Legal Aid funding, given that the Province announced budgetary cuts across nearly all Ministries. However, all Law Society licensees should be shining a spotlight on what these cuts would mean for the administration of justice and for society in Ontario.

We, as lawyers and paralegals, must recognize that a cut of this magnitude to Legal Aid Ontario funding cannot be absorbed without a direct and irrevocable impact on access to justice for the most vulnerable among us. Studies in multiple jurisdictions have shown that every dollar retracted from legal aid leads to a $3-5 increase in other areas of government expenditure, such as homelessness, healthcare costs, family breakdown and incarceration.

The sweeping budget cut to Legal Aid, and the prohibition given to Legal Aid to cease providing funding for immigration and refugee matters, should be alarming to us all. We must do everything we can to avert this cut, for our clients and for the cause of justice in this province.

We know how the justice system struggles to deal currently with unrepresented litigants. These cuts will just add more persons into that queue, as fewer people qualify and fewer certificates are issued. Fewer hours may be granted where certificates are issued, leaving the profession to pick up the slack via pro bono hours, or leaving the client to fend for themselves when the clock has run out.

Community legal clinics are also funded by Legal Aid Ontario. We practice in poverty law areas such as housing, income security, disability programs, employment standards, employment insurance, Canada Pension Plan, victim's assistance, and worker's compensation. A budget cut for us of that size would dramatically impact our ability to provide legal services that keep a roof over our clients' heads and food on their table.

The type of legal help legal aid clients need is NOT something that a call centre or a do-it-yourself technology can provide. Often legal aid clients have disabilities, literacy issues, or mental health concerns that make it very difficult to cope with technology. They lack funds to pay for cell phone minutes and lack internet access. They live in rural, remote areas outside of transportation routes.

Access to justice" is not just some throwaway phrase that has no meaning in the lives of low-income persons. There are approximately 9000 people - about 1 in 10 local residents - living below the poverty line in this county. With this cut to Legal Aid funding, more and more of those people will be left on their own to solve their legal issues.

Ours is an honourable profession. I believe we have a duty to speak up to oppose any actions that would jeopardize the most basic right of access to justice for our low-income neighbours. I ask each of my legal profession colleagues in Northumberland to contact the Attorney General, the Premier and our local MPP to tell them that you do not support the budget cuts to Legal Aid.

For your convenience, you can use either of these sites to send an email:

https://www.stoplegalaidcuts.ca/
or
https://stoplegalaidcuts.nationbuilder.com/

Stop the Cuts: Access to Justice for All
Hashtag: #Justice4All

## Plug into Podcasts

By: Emma Durand-Wood, for *Slaw.ca*

If you were paying attention to the last installment of the Canadian Law Blog Awards (aka Clawbies) this past December, you probably noticed that podcasts are more popular than ever. The top prize even went to a podcast this year!

Today's tip is to expand your professional development horizons past print and in-person, and check out a podcast.

A good place to start is with the outstanding productions that were mentioned in the 2018 Clawbies:

- The Docket by Michael Spratt and Emilie Taman
- IdeaBlawg podcast by Lisa Silver
- Lawyer Life Podcast by Darlene Tonelli and Mike Anderson
- Diversonomics Podcast by Gowlings WLG
- Jumping off the Ivory Tower Podcast by Julie Macfarlane and Dayna Cornwall
- Hull on Estates podcast by Hull & Hull
- Intrepid Podcast by Stephanie Carvin and Craig Forcese
- Paw & Order Podcast by Peter Sankoff and Camille Labchuk
- Of Counsel Podcast by Sean Robichaud
- Cases That Should Have Gone to the SCC But Didn't by Kyla Lee [vlog]
- Stereo Decisis Podcast by Robert Danay, Oliver Pulleyblank and Hilary Young
- Objection! By Kelly Doctor and Nadine Blum

Other great podcasts (including more Clawbies winners) can be found in the lawblogs.ca Podcasts & Vlogs section.

For more recommendations, including a bunch from beyond Canada, check out Connie Crosby's recent post: Legal Knowledge Professionals' Podcast Roundup – Jan 18 2019

## A "Business Coaching for Lawyers" Explainer

By: Sandra Bekhor. For *Slaw.ca*

Have you ever had a conversation with someone – a spouse, a colleague, an advisor – that shifted things for you? You somehow felt just a little less burdened or constrained after the fact? More hopeful even?

They asked the right questions.

They listened, actively, as you tried to sort something out, aloud.

They shared from their own experience.

They gave you something profound to mull over.

Well, folks, that's essentially the value of business coaching.

Whether your struggles are focused on practice development, accountability from your team, leadership in your community, communication with clients or learning to delegate more, coaching conversations with a skilled consultant can help you to overcome your biggest obstacles to growth.

Those obstacles were there a month ago. Six months ago. Even a year ago. You can safely predict that they will continue to fester. But you don't have to just sit back and wait. Begin the process of effecting change with a meaningful conversation today.

## Spotlight on Historic Members

### Zacheus Burnham

The Burnham family name is sure to be familiar to anyone who has spent time in Northumberland County – they have long since been credited as one of the founding families of Cobourg. They were responsible for Cobourg gaining the county seat, the construction of the original County Court House, for the establishment of roads and schools. At a time before Confederation, and during the same year as the founding of the Law Society of Upper Canada, this family of settlers moved into (what is today) Northumberland County.

Zacheus Burnham was born on 20 February 1777 in Dunbarton, New Hampshire, to Asa Burnham and Elizabeth Cutler. He came to Upper Canada in 1797 and settled in Hamilton Township, Newcastle District. On 1 February 1801 he married Elizabeth Choate, and together they had five daughters and one son. That same year Zacheus joined the local militia as a private; by the War of 1812 he was a Captain. He remained active in the local military as a member of the First Regiment of the Northumberland Militia, and as a Colonel he led a company to Toronto in response to the Rebellion of 1837.

After his arrival in Upper Canada he began to acquire land, and it's no surprise that he quickly became one of the largest land holders in Newcastle District. He owned the land upon which the village of Ashburnham is situated, and also purchased lots north of Elgin Street (at Burnham Street), where the village of Amherst was founded. This is also where the first court house in the United Counties of Northumberland and Durham was constructed, on the land north of Elgin and west of Burnham streets.

The first court building in 'Amherst' (Cobourg) was first used by the magistrates for their Quarter Session meeting on January 13, 1807. Around 1830, the original wooden building that had been used as both court house and jail, was deteriorating badly, and becoming unstable. It was decided that a new court house would be built, on land donated to the town by Zacheus Burnham. A new location, on the west side of Burnham Street, was chosen. Today this is the location of the current Northumberland County building. The court remained there until the construction of Cobourg's Victoria Hall, when it was moved into the 'old bailey'.

By 1821 he held 1,780 acres, and by 1831 he kept 20 milk cows, 100 neat cattle, 150 sheep, 70 pigs, and 10 horses on his farm – which remained the largest and most productive in the area prior to 1850.

In 1811 Zacheus became a road commissioner for Newcastle District, and in 1813 he was appointed a Justice of the Peace. By 1815 he was named District Treasurer, a position he held until 1851. From 1817 until 1820 he represented Northumberland and Durham in the House of Assembly, which at the time was attempting to get the province moving again after the War of 1812.

His main contributions were concerning issues of road improvements, the establishment of schools, and the adjustment of property assessment laws. A Justice of the Peace, he was elected to the Legislative Assembly in 1831 and was appointed to the Legislative Council by Lieutenant Governor Sir John Colborne, a position he served in until 1841. In July 1839 he was appointed a judge in the Newcastle District court.

Zacheus Burnham died 25 February 1857, in Cobourg – leaving behind a huge legacy, and Northumberland's humble beginning.

## NCLA Summer Party

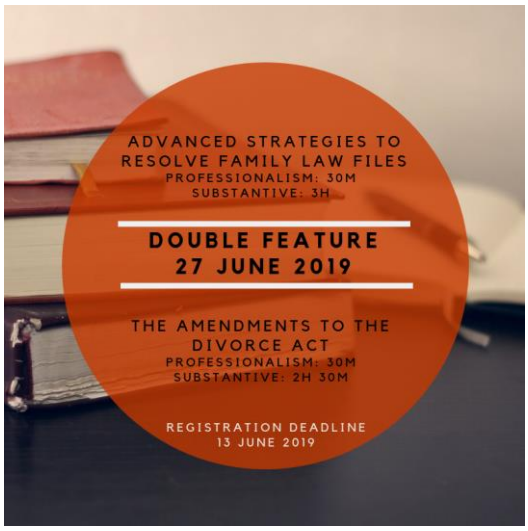
Join us on 13 June 2019, at the Cobourg Mill Restaurant & Pub. The cost is $65/pp, with cocktails to begin at 5:30pm

This year, we're asking when members RSVP, to also include the answer to the question:

***"If I wasn't a lawyer, I would be ..."***

## Upcoming CPDs

The NCLA has been growing rapidly – and so have the needs of our members. Please take a moment to complete this survey: https://bit.ly/2YkPA0l



***To register, or request content, please contact the librarian!***

## FOLA Update

By: Katie Robinette, *Executive Director, Federation of Ontario Law Association*

FEDERATION OF ONTARIO LAW ASSOCIATIONS
FÉDÉRATION DES ASSOCIATIONS DU BARREAU DE L'ONTARIO

It's been almost a year since I started working for FOLA and what a year it's been! As some of you will know, FOLA just wrapped up our May 2019 Plenary, which we kicked off with a bang at Toronto's Albany club with a Dinner featuring a "Behind the Scenes at the CBC Series Street Legal Q&A" with Showrunner Bruce M. Smith, Actor Steve Lund and moderated by Toronto Entertainment Lawyer & Actor, Roselyn Kelada-Sedra followed by a lively Hospitality Suite back at the hotel (which apparently went on well into the early morning!).

With an over-arching theme of tech and the practice of law, we were also treated to a talk on mental health and wellness, heard from our Committee Chairs, and had a very helpful Q&A session about Legal Aid. You can view most of our Committee Reports, presentations and talks on our website. A handy two-page post plenary report was also sent to all Presidents and Law Librarians and if you haven't seen that yet, we've also posted that online.

Now for what's keeping us busy now that Plenary is finished.

There's no doubt that you are all too aware of the drastic cuts to legal aid proposed by the Ontario Government and this issue is at the top of our radar. In the government's first budget, they announced a $133M reduction in the LAO budget for the upcoming 2019-2020 year -surprising and concerning Ontarians from across the province. In addition to meetings with Minister's staff at Queen's Park, FOLA is a member of the Alliance for the Sustainability of Legal Aid (ASLA) and we have held two meetings which resulted in two separate items of correspondence to the Honourable Caroline Mulroney, Attorney General of Ontario. The first identified the "vital role" of LAO with services to "individuals in the most dire circumstances" and the impact on LAO's capacity to serve given the "significant funding cut." The second letter addressed issues specific to "the elimination of funding for refugee and immigration law services." Both letters closed with an urgent request was made for a meeting to discuss these matters. A letter was also sent to the Honourable David Lametti, the Minister of Justice and Attorney General of Canada, with the goal being to assure LAO of full funding for immigration and refugee law while pursuing a constructive resolution of the dispute with the province. And finally, a fourth letter was sent to Mr. Charles Harnick, Q.C. to congratulate him on his new position as Chair of the LAO Board of Directors and an urgent plea was made to sit down with him to discuss the current budget issues and to work for sustainability of LAO. Mr. Harnick's office has been in touch and we are currently working on setting a date for our meeting.

But that's not the only item on our radar related to the Ontario Government. Also tucked into the Budget Act is a proposal to repeal the Proceedings Against the Crown Act and replaces it with the Crown Liability and Proceedings
Act, 2019. The new Act addresses Crown liability, including the limits on it, and sets out the procedural rules that apply in proceedings against the Crown and, in some cases, proceedings to which the Crown is a party. You can read more about the Act under Schedule 17: Crown Liability and Proceedings Act, 2019. FOLA has some concerns about this new Act and meetings with Minister's staff have begun to take place. We are also in discussions with other organizations and individuals with the goal of better understanding the ramifications of this legislation. More information will be coming.

Coming this summer, watch for changes to auto insurance. The Minister of Finance and his Parliamentary Assistant, Doug Downey, MPP are currently working on legislation loosely titled "Putting Drivers First". In early May, FOLA was invited to a closed door consultation with other stakeholders at Queen's Park and we learned that, while this will be a "multi-year transformational issue", year one priorities include: a "Driver Care Plan" a "Care not Cash" initiative, a move to $2M default benefit, comprehensive assessment reform, consent to credit check, e-commerce/e-communications initiatives, and electronic proof of auto insurance. Discussion papers will be issued and posted on the government website this summer on the Driver Care Plan and the Care not Cash initiatives and they tell us they will be creating surveys for the public. While FOLA regrets that more information can not be made available at present, please know that we are actively following this issue and will be building out a dedicated page on our website to

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ensure that we are as transparent in providing any and all information available and we will be working with all Members to ensure that our views on this (as all) issue reflect our membership.

Before I sign off, you should also know that FOLA is actively engaging with the new Benchers (some of who attended our Plenary) and are preparing submissions to the Law Society's Access to Justice and Pro-Bono Legal Aid reforms (both due May 31st). And, as always, if you have input on these, please do send us your comments prior to May 21st so that we can include them into ours. Feel free to send anything you have to Katie.Robinette@fola.ca and I will ensure that your comments are directed to the appropriate Board Member(s).

While this concludes my Northumberland newsletter entry, there's always more! So please do visit us at www.fola.ca often and sign up for our newsletter to ensure you are always up to date!

Enjoy the summer!

## From the President

This is my first newsletter message since becoming President of the Association in March of this year and I am just getting my feet wet in this new role. Practicing law in a small community is not easy and often isolating, so if you think the association can do anything to ease some of the burdens or pressures (or simply to make life more fun) please reach out with your suggestions.

I attended the FOLA Plenary session held in Toronto May 9 and 10. Speakers included David Field, CEO of Legal Aid, Dan Pinnington, President & CEO of LawPRO and Diana Miles, CEO of LSO. The theme for this Plenary was technology, the take away being that we must all embrace the changes that technology brings and find ways to use it to our benefit. If anyone would be interested in getting speakers out to our association to discuss technology and its impact on the practice of law (social media, software, fraud prevention, etc.), please reach out to us to discuss. For a quick recap of what took place at Plenary and various links I would encourage you to take a look at the Post Plenary Wrap Up Report: https://fola.ca/fola-plenary-may-2019 .

I sent an email out about a month ago seeking members to join various NCLA committees. If you are interested in becoming more involved with the association, please reach out to us. Otherwise, please be prepared to say yes should we reach out to you to assist as we are very interested in taking advantage of the many talents our association members have to offer!

Do not forget that Thursday, June 13th is our summer party. There will be golfing and spa-ing as usual (if you are interested in either there may still be time to participate, please reach out to us to obtain more info). We will all meet for dinner at the Mill in Cobourg at 5:30pm. Details and RSVP requests will be forthcoming. Our association has been growing and this will be a great opportunity to connect with each other and meet new members. I look forward to seeing you there!

Meaghan Adams
NCLA President

THE NORTHUMBERLAND COUNTY LAW ASSOCIATION
EXECUTIVE COMMITTEE

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