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**MPP Peter Bethlenfalvy,
Minister of Finance
7 Queen's Park Crescent West
Toronto, ON M7A 1Y7**

Re: Submission of Thesis — *The Statutory Appraisal Process in Ontario: A Systemic Failure in Need of Structural Reform*

Dear Honorable Minister:

I am writing to provide you with a copy of my thesis, *The Statutory Appraisal Process in Ontario: A Systemic Failure in Need of Structural Reform*. This work is the culmination of several decades of direct, practical experience within the statutory appraisal process under the Ontario *Insurance Act*, combined with extensive legal analysis and a detailed review of industry practices, case law, and comparative jurisprudence.

The purpose of this submission is straightforward:

to assist policymakers, regulators, insurers, legal practitioners, and appraisal professionals in understanding the structural weaknesses that have developed within Ontario's appraisal system, and to offer a principled framework for reform.

The thesis identifies several systemic issues that have emerged over time, including:

- the absence of procedural safeguards
- the lack of jurisdictional boundaries
- inconsistent and incomplete valuation practices
- the absence of meaningful judicial oversight
- outdated statutory language rooted in the Standard Fire Policy
- the misalignment between modern multi-peril policies and the statutory appraisal mechanism

These issues are not the result of individual misconduct. They are structural in nature, arising from statutory gaps, evolving industry practices, and the absence of a modernized regulatory framework. The result is a process that often exceeds its intended jurisdiction, produces inconsistent outcomes, and undermines fairness for both insureds and insurers.

The thesis proposes a reform model grounded in four structural pillars:

1. **Jurisdictional Discipline**
2. **Completeness of Valuation**
3. **Procedural Fairness and Integrity**
4. **Structured Judicial Oversight and Remedies**

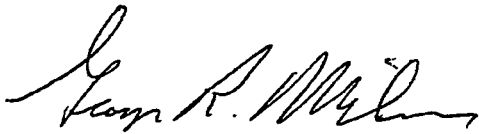
These pillars reflect principles already recognized in Canadian jurisprudence, including the British Columbia Supreme Court's decision in *Farrier*, which remains the clearest articulation of the limits of appraisal jurisdiction in Canada.

My objective is not to criticize any individual or organization, but to contribute constructively to a conversation that is long overdue. The appraisal process affects thousands of Ontarians each year, and its proper functioning is essential to public confidence in the insurance system.

I would welcome the opportunity to discuss the findings and recommendations contained in this thesis, or to provide further clarification or assistance as needed.

Thank you for your time and consideration.

Sincerely,



George R. Milnes

cc Geoffrey B. Morawetz
Chief Justice of the Ontario Superior Court of Justice

cc John Dexter, CEO
Financial Services Regulatory Authority of Ontario (FSRA)