

***Protect Ontario Through Safer
Streets and Stronger
Communities Act, 2025 -
Introduction of new, proposed
Measures Respecting Premises
with Illegal Drug Activity Act,
2025***

AMO'S SUBMISSION TO THE MINISTRY OF THE SOLICITOR GENERAL

June 4, 2025

Introduction

The Association of Municipalities of Ontario (AMO) is a non-partisan, non-profit association representing the 444 municipal governments across Ontario. Municipal governments work through AMO to achieve shared goals and meet common challenges. As the frontline order of government closest to the people, municipal governments are deeply invested in the safety and wellbeing of residents. They are also on the frontlines of responding to the intersecting crises of homelessness and mental health and addictions in communities across the province.

Municipal governments act as landlords for residential and commercial premises, including community housing, supportive housing and emergency shelters. Given this municipal role, AMO is providing comments about Bill 10, the [*Protect Ontario Through Safer Streets and Stronger Communities Act, 2025*](#) specifically with respect to Schedule 8 introducing the new proposed [*Measures Respecting Premises with Illegal Drug Activity Act, 2025*](#).

This submission provides AMO the opportunity to outline technical considerations about the Bill's implementation and proposed next steps for consultation leading up to the posting of regulations under the Act.

Technical Comments about Bill 10, Schedule 8

The legislation is drafted to hold landlords accountable for knowingly permitting the production or trafficking of drugs in their building or knowingly possessing the proceeds of these offences. This will have implications for landlords and subletters of residential and commercial buildings who lease their premises, including municipal and nonprofit providers of community, transitional and supportive housing, and potentially also homeless shelters and drop-in service centres.

AMO supports increased public safety measures to better protect tenants in buildings in efforts to reduce illegal and predatory behavior caused by illegal drugs. Municipal housing providers want to keep their buildings safe and prevent criminal activity, but they sometimes have limited options to respond.

Municipally-operated social housing buildings support some of the most vulnerable Ontarians. These residents have increasingly complex needs, which require supports and services (e.g., mental health and addictions treatment) that are often unavailable or have long waiting lists.

When illegal drug-related activity is taking place, the police often have limited resources to arrest and charge offenders. Housing providers have no control whether the police lay charges. Some municipalities and District Social Service Administration Boards have faced challenges in evicting tenants that are putting the health and safety of other residents at risk because community and supportive housing is often seen by the Landlord and Tenant Board as housing of last resort. Hearing delays at the Landlord and Tenant Board also persist despite recent provincial actions to reduce them.

Given this, AMO is seeking a review of the Landlord Tenant Board processes and decision history with respect to housing provider efforts to evict tenants for unlawful activity due to violence and drug trafficking with appropriate recommendations for change including addressing delays in hearings for these matters.

Another consideration is that shelters, drop-ins and supportive housing buildings can have on-site harm reduction services. While the Bill does not hold landlords accountable for drug use on their premises (only production or trafficking), this legislation may increase hesitancy to offer any drug-related services for risk that trafficking could occur. This would compromise the ability to provide services to these individuals, which could lead to increased overdoses and communicable disease transmission.

While the legislation does include a defence provision, guidance is needed on what constitutes “reasonable measures” to stop illegal drug trafficking and production activities to provide legal protection for housing providers acting in good faith and with due diligence.

AMO understands that the definition of landlord will be prescribed by regulation under the Act. AMO will be seeking to provide input and seek clarity on the definition of a landlord as it applies to municipal services.

Next Steps for Consultation

In the lead-up to legislative Royal Assent and any regulatory postings, the government is urged to work with municipal government representatives, Indigenous Peoples organizations and other stakeholders across the province in the housing, mental health and addictions sectors. This should include AMO, the Ontario Municipal Social Services Association, the Northern Ontario Service Deliverers Association, the non-profit and co-operative housing associations. The purpose would be to identify and avoid unintended consequences including risking adverse actions to people requiring and in receipt of harm reduction services. As an outcome, AMO is seeking to ensure that no undue burdens and risks are created for municipalities and District Social Service Administration Boards in our roles as owners, operators, and managers of community housing, supportive housing and emergency shelter systems.

Conclusion

AMO is encouraged by this consultation by the government and looks forward to working further on the implementation details. Any questions about this submission can be directed to Michael Jacek, Senior Advisor at mjacek@amo.on.ca.