



# **Bill 6, *Safer Municipalities Act*, 2025**

May 23, 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 of Ontario and are confronted by the reality of homelessness in our communities.

AMO and other municipal associations continue to advocate for provincial and government support in preventing, reducing and ultimately ending homelessness, starting with chronic homelessness. In a province as prosperous as Ontario, homeless encampments cannot be the best we can do for our residents, communities, and businesses. We know we have the capacity to solve this problem. All that we need is the resolve.

Given this, AMO is pleased to provide comments about Bill 6, the [Safer Municipalities Act, 2025](#). This issue is a top area of focus for AMO given the ongoing negative social, health and economic impacts that homelessness crisis presents with the devastating toll it is taking on people and communities. Action is needed to address the significant number of encampments that can now be found in all parts of Ontario across urban, rural and northern communities.

This submission provides AMO's recommendations about how to resolve encampments by addressing the root causes of the homelessness crisis. It also outlines technical considerations specially about the Bill's implementation.

## **Tackling Homelessness and Resolving Encampments**

The homelessness crisis in Ontario is at a tipping point. More than 80,000 Ontarians were known to be homeless in 2024, a number that has grown by more than 25 percent since 2022. This is the stark finding of a recent AMO report released in January 2025, ["Municipalities Under Pressure: The Human and Financial Cost of Homelessness in Ontario."](#) The research was undertaken by AMO in collaboration with HelpSeeker Technologies, the Ontario Municipal Social Services Association (OMSSA) and the Northern Ontario Service Deliverers Association (NOSDA).

The situation will only get worse if we don't act. According to modelled projections, homelessness will continue to increase without additional investments for housing solutions and other interventions. Best case estimates show homelessness could double in the next 10 years or grow to nearly 300,000 by 2035 if there is an economic downturn. This rate of growth would be expected to significantly increase the number and size of encampments in the province. The scale and scope of homelessness should be unacceptable in Ontario.

AMO is encouraged by the provincial focus on addressing this crisis. While enforcement has a role to play, especially where there are health and community safety concerns for both the encampment residents and broader community, enforcement alone will not end encampments and tackle the homelessness crisis.

The resources announced in December 2024 accompanying the original Bill 262, including additional funding for emergency shelters, affordable housing, and the Canada-Ontario Housing Benefit (COHB) were much-needed. These investments plus those recently announced for Homeless and Addiction Recovery Treatment Hubs (HART Hubs) represent a recognition that enforcement alone will not effectively address encampments.

While those investments are a good start, there is a need to fundamentally re-orient the system away from short-term crisis response and toward long-term sustainable housing solutions. Ontario communities need action to tackle the root causes of homelessness:

- Significant investments in transitional, supportive and community housing to both expand supply and address the \$11B capital repair backlog to maintain existing supply in fair condition.
- Expansion of mental health and addictions supports to improve access and reduce wait times.
- Investments in income security.

Our recent [report](#) estimates that investing \$2 billion to expand housing options and invest in homelessness prevention is needed to resolve existing encampments, with the most significant reductions in the first three years.

In addition, an investment of \$11 billion over ten years would significantly reduce and help end chronic homelessness. Municipalities have already stepped up contributing about \$2.1 billion to housing and homelessness prevention in 2024 from the property tax base. This is a lot of money, but there is a societal cost to inaction and there will be a return on investment.

## **Technical Comments about Bill 6**

Given the legislature's current consideration, AMO is commenting on the two key components in Bill 6 primarily to provide consideration around their feasibility and effectiveness in order to assess what else is required to resolve encampments and tackle homelessness.

First, the creation of the *Restricting Public Consumption of Illegal Substances Act, 2025* would prohibit the consumption of illegal substances in public places. This would also permit a police officer or prescribed provincial offenses officer to direct a person to leave the public space, provide their name, date of birth and address, and seize illegal substances. If convicted, penalties could include a fine up to \$10,000, imprisonment up to 6 months, or both.

Amendments to the *Trespass to Property Act* will add two aggravating factors for sentencing in the case that the defendant was given notice to leave the premises and was on the premises after the applicable period of time, regardless of whether they left in the interval. At the time of sentencing, the court finds that the defendant is likely to trespass at any time in the future.

While additional police and court power and tools to enforce, charge and prosecute public drug use and trespass offences may be helpful for police in some specific circumstances, they are not municipal tools. Municipalities do not direct police services or courts. It is unclear how police services would utilize these new tools, if granted.

The Ontario Association of Chiefs of Police have stated through their [Drug Strategy Framework](#) that while additional enforcement tools may be helpful, the opioid crisis is a public health issue that requires a multi-faceted public health approach, including prevention/education, choices for recovery, detox and treatment, and supervised consumption sites within local Community Safety and Well-Being Plans.

Voices from the mental health and addictions servicing sector have expressed that housing is the only solution to homelessness, especially supportive housing. They also raised concerns that the enforcement actions could lead to more individuals using drugs alone, which could increase overdoses. There are also concerns that these actions would disproportionately impact already disadvantaged people, including Indigenous and racialized Ontarians. AMO has also called for a comprehensive approach to the toxic drug crisis, including investments in prevention, treatment, harm reduction and enforcement through our report [“The Opioid Crisis: A Municipal Perspective.”](#)

It should also be considered that there are potential consequences associated with incarceration from these new offences that may add to the crisis over the long-term. There is the risk of homelessness upon discharge from a jail or correctional facility creating a cycle that may repeat itself. Furthermore, incarceration can exacerbate existing vulnerabilities, making it harder for people to obtain stable housing after release. The evidence also demonstrates that it is more cost effective to have someone in supportive housing than it is to jail in a correctional facility. The cost of incarceration is \$302 per day versus \$67 to \$167 per day in supportive housing depending on the level of acuity supported.

The new *Provincial Offence Act (POA)* charges proposed under the *Restricting Public Consumption of Illegal Substances Act, 2025* would also have operational impacts on municipalities. *POA* courts are administered by municipalities and are already burdened by sizable and growing case backlogs and significant challenges collecting unpaid fines.

These new offences are Part 3 *POA* offences, which require automatic court appearances and prioritization over other *POA* offences. This would further exacerbate *POA* court backlogs, and any fines would be very difficult and labour intensive to collect.

As outlined in AMO’s report [“Homeless Encampments in Ontario: A Municipal Perspective”](#) AMO has called for provincial guidance to help municipalities take appropriate and consistent approaches to homeless encampments in a complex and evolving legal and policy landscape. While these additional police and court tools may be helpful in specific circumstances, they do not provide the municipal sector with the broad guidance necessary to appropriately balance the needs of unsheltered people living in encampments, who deserve to be treated with empathy and respect, and a responsibility to ensure our communities are safe and vibrant places for all residents. Municipalities need clear guidance from the provincial government regarding how to address encampments when resource realities and the rights of groups and individuals appear to be at odds.

## **Conclusion**

AMO is encouraged that the province is seized with the need for urgent action to address the homelessness crisis.

However, this bill will not address the root causes of homelessness that have given rise to encampments across the province and will create significant operational challenges for municipalities.

Municipalities are committed to working collaboratively with the province to end this crisis. We need significant and sustained provincial investments in deeply affordable housing, including transitional housing and supportive housing plus improvements to income security and a comprehensive approach to mental health and addictions.

AMO is looking to conversations with the government about the actions and investments required to prevent, reduce and ultimately end homelessness, starting with encampments and chronic homelessness.