

# **Proposed New Regulations under the Measures Respecting Premises with Illegal Drug Activity Act, 2025 (MRPIDAA)**

AMO SUBMISSION TO THE MINISTRY OF THE SOLICITOR GENERAL

**PROPOSAL NUMBER 26-SOLGEN003**

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## 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 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.

AMO appreciates the opportunity to provide input on the proposed regulations because municipal governments, District Social Service Administration Boards and their funded non-profit and co-operative housing providers act as landlords for residential and commercial premises, including community housing, supportive housing, emergency shelters and drop-in services. There are implications for these landlords under the *Measures Respecting Premises with Illegal Drug Activity Act, 2025* (MRPIDAA).

AMO recognizes the provincial government's positive intention to remove municipal, non-profit and co-operative providers of community, transitional, and supportive housing from the definition of landlord in the regulations under the Act. This change reflects AMO's implementation advice to the province regarding the Act.

## AMO Feedback on MRPIDAA Implementation

### AMO welcomes exemptions to the definition of "landlord"

Municipalities play an important role as landlords for community housing, supportive housing, and emergency shelters. Municipally operated and funded housing supports some of the most vulnerable Ontarians with increasingly complex needs, which require supports and services that are often unavailable or have long waiting lists.

AMO strongly supports the proposed regulatory exemptions to the definition of residential "landlord". We strongly endorse the exclusion of the following community housing providers from the definition: municipalities, District Social Service Administration Boards (DSSABs), Local Housing Corporations (LCHs), housing cooperatives, and non-profit housing providers. These exemptions recognize the unique

role of community housing as a provider of last resort for individuals and families experiencing housing instability, complex health needs, and elevated risk of homelessness. Ultimately, this change avoids new barriers being created for vulnerable people in need of housing, avoids unnecessary evictions and refusal of tenant applications, and strengthens our collective efforts to address homelessness.

Further, the proposal also exempts long-term care homes from the definition of “landlord”. AMO supports this exemption as these homes provide accommodation and care for frail seniors with complex needs and behaviours where there are no other options for them.

It is also important to consider the important role of municipalities and our partners in providing emergency shelters and drop-in services for vulnerable homeless people. Emergency shelters are facilities providing immediate, short-term, or overnight accommodation to individuals or families experiencing homelessness with a goal of providing transitions to permanent housing. Drop-in facilities are locations that provide a range of supports to people who are homeless or at risk of homelessness. These services often include essentials like food, showers, laundry, health services, and referrals to other services, but not overnight shelter. AMO asks that these facilities be treated the same as the other entities for similar reasons and be exempted from the “landlord” definition.

#### Supporting private-market landlords’ role and responsibilities

We encourage the province to implement robust education measures for the private-market residential and commercial landlords who will be prescribed by the regulation under the Act. Providing these landlords with best practices for community safety, with strict enforcement used only as a last resort, is critical to preventing housing loss. Supporting these landlords in managing these challenges is key to our broader goals – every successfully tenancy maintained in the private sector averts further pressure on our already overwhelmed municipal and non-profit social housing systems.

While tools are needed to address illegal activity, we recognize the important role responsible private landlords play in addressing the housing affordability and homelessness crisis. It is important that this legislation does not unintentionally incentivise landlord behaviours that force people with substance use challenges into unsafe places. We urge the province to ensure that landlords acting in good faith and

taking reasonable steps to manage their properties do not face disproportionate enforcement risk. Without this clarity, a “chilling effect” of heightened liability or enforcement uncertainty may discourage private-market participation and jeopardize housing for vulnerable populations.

AMO supports enforcement measures under the Act that prohibit private landlords from knowingly permitting their premises to be used in relation to illegal drug activities that are prescribed under the Act or knowingly possessing the proceeds of an offence under the Act. This would be useful to address unlicensed and illegal drug retail shops and premises in communities.

Finally, the availability of appropriate treatment (including through access to HART Hubs) remains essential for supporting individuals experiencing mental health and addictions challenges. We also encourage the Ministry to collaborate with local housing systems to prioritize eviction prevention and support continued progress in addressing homelessness.

## **Conclusion**

The proposed regulation with the exemptions is a welcome response to our initial feedback, and we look forward to collaboration in the implementation of MRPIDDA. Through these proposed changes, the government is helping to maintain a strong housing continuum for vulnerable people while still addressing illegal drug activity. The proposal could be further strengthened by extending the “landlord” definition exemptions to emergency shelters and drop-in services.