June 5, 2025

**Re: Regulatory Registry 25-SOLGEN007 – Introduction of new, proposed Measures Respecting Premises with Illegal Drug Activity Act, 2025**

Dear Ministry of the Solicitor General,

On behalf of the Ontario Non-Profit Housing Association (ONPHA) and our housing provider membership, I am pleased to provide written feedback and considerations on the government’s proposed *Protect Ontario Through Safer Streets and Stronger Communities Act, 2025*.

ONPHA is the leading voice of non-profit housing in Ontario and has been championing affordable housing for over 30 years. Our 500+ members provide safe, affordable, and stable housing to over half a million Ontarians. Collectively, we are one of the largest developers in the country, with built assets amounting to ~$30 billion.

ONPHA shares the government’s desire to reduce crime and promote safe communities across the province. Our membership directly contributes to these outcomes by providing long-term affordable housing to a range of residents across the housing continuum, and for some tenants, personalized wraparound supports that promote stable tenancies. However, given the unique mandate of non-profit housing in Ontario, ONPHA is sharing several concerns with the proposed Bill 10.

First, while the province indicates that clear guidance and communication to landlords will be provided about what constitutes “reasonable measures” to prevent, report, or respond to illegal activity, an important distinction should be made between non-profits and for-profit landlords regarding their financial capacity to deter crime and manage penalties. Many of our members are already investing where they can in additional security, lighting, and other infrastructure to deter criminal activity, but the means to support continued investments with no additional government support is limited in light of other budgetary pressures.

Second, the impacts of Bill 10 will be acutely felt in the non-profit housing sector as many non-profit providers are supporting vulnerable populations that may suffer from preexisting addictions and mental health challenges and would otherwise live unhoused if left to the private rental market. Our sector is already shouldering the burden of supporting the most vulnerable tenants in our society, and the proposed legislation will only add to these challenges and impact harm reduction strategies.

To that end, we strongly urge the government to consult with the non-profit housing sector and consider the unique complexities of our operating environment in the development of Bill 10. ONPHA would be pleased to provide additional feedback and perspectives as the government continues to move forward with this legislation.

Sincerely,

Marlene Coffey

Chief Executive Officer, ONPHA