



ONTARIO NON-PROFIT
HOUSING ASSOCIATION

February 27, 2026

RE: Regulatory Registry 26-SOLGEN003 – Proposed New Regulations under the *Measures Respecting Premises with Illegal Drug Activity Act, 2025*

Dear Ministry of Solicitor General,

On behalf of the Ontario Non-Profit Housing Association (ONPHA) and our membership, I am pleased to provide written feedback and considerations on the government's proposed regulations under the *Measures Respecting Premises with Illegal Drug Activity Act, 2025*.

ONPHA is the leading voice of non-profit housing in Ontario and has been championing affordable housing for over 30 years. Our 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 ~\$38 billion.

We appreciate the Government of Ontario listening to our feedback on the initial consultation by clarifying ambiguity and seeking to exempt community, supportive, and transitional housing providers from the definition of a "landlord" through a regulation. This exemption appropriately recognizes the distinct role of our membership in the housing continuum, particularly in the supportive and transitional housing space, and avoids unintentionally shifting enforcement responsibilities onto organizations that are not funded, equipped, or mandated to carry out these functions.

Like other landlords, our providers always strive to maintain safe premises and support tenant stability, but operational and financial resources are often stretched. Imposing additional liability or compliance obligations risks creating legal uncertainty, governance challenges, and further operational strain, particularly for organizations serving vulnerable populations. We also note that many non-profit providers rely on volunteer Boards of Directors. These changes would reduce risk exposure for volunteer leadership and ensure that sector capacity remains focused on housing provision and supporting successful tenancies.

As a result, ONPHA strongly supports the government's proposed exemptions from the definition of "landlord" to include:

- "Community, supportive, and transitional housing landlords. This includes non-profit housing providers, housing cooperatives, municipalities, District Social Services Administration Boards (DSSABs), Local Housing Corporations (LHCs), and non-profit organizations.
- Other community and/or supportive housing units owned and/or operated by private market landlords (e.g., private market landlords who own/operate units that receive a government-funded rent supplement)."

ONPHA remains committed to working collaboratively with the Ministry to advance community safety objectives. We believe that recognizing the distinct role of community and non-profit landlords will strengthen the overall effectiveness and fairness of the legislation.



Thank you for the opportunity to provide input on this proposal. We would welcome continued engagement as the regulatory framework is finalized and implemented.

Sincerely,

Marlene Coffey,
Chief Executive Officer, ONPHA