

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 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.

ONPHA shares the government's desire to reduce crime and promote safe communities across the province, and our membership directly contributes to these outcomes by providing long-term affordable housing to Ontarians. However, given the unique mandate and operating environment of non-profit housing in Ontario, ONPHA is sharing several concerns with the proposed regulations.

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 the financial capacity of non-profits and for-profit landlords. Many of our members have and are investing in additional security, lighting, and other infrastructure to deter criminal activity, but given rising operating costs and thin margins, are limited in making these investments considering other budgetary pressures. As a result, any additional costs placed on non-profit housing providers to conform to the regulations based on the expectations of "reasonable measures" should be covered in whole by the province through a dedicated fund.

Second, the introduction of regulations imposing potential fines on Board members and staff in the non-profit housing sector could have profound implications. In this sector, Board members often serve as volunteers, and the prospect of personal liability may deter individuals from taking on these roles. This shift could lead to challenges in retaining and recruiting Board members and volunteers, potentially affecting the quality of governance and the capacity to support individuals with complex needs. Similarly, staff working in supportive and transitional housing environments might face uncertainties regarding their responsibilities, which could influence their recruitment

and the manner in which they provide care and support. If personal liability is enforced, the sector may experience significant impacts on Board and volunteer retention, governance structures, and operational effectiveness.

Third, non-profit housing providers in Ontario play a crucial role as landlords for some of the province's most vulnerable populations. While these organizations are committed to ensuring safety within their properties, they face limitations due to the nature of their staff and volunteers. Unlike law enforcement officers, these individuals are not trained to handle security threats, and their capacity to respond is constrained by budgetary and safety considerations. Therefore, it is essential that any new regulations do not impose excessive burdens on an already stretched sector. The introduction of such regulations could potentially divert resources away from core services, affecting the quality of support provided to residents. To maintain the effectiveness of non-profit housing providers, it is imperative that regulations are carefully crafted to avoid placing undue strain on these organizations.

As the government moves forward with Bill 10 and these regulations, we strongly urge consultation with the non-profit housing sector to ensure the province's approach reflects and considers our unique operating environment. In addition to this letter, ONPHA would be pleased to provide additional perspectives to SOLGEN in developing and implementing these regulations.

Sincerely,

A handwritten signature in black ink, appearing to read 'Marlene Coffey', with a stylized, cursive script.

Marlene Coffey
Chief Executive Officer, ONPHA