



March 8th, 2026

Hon. Solicitor General Michael Kerzner, Ministry of the Solicitor General

Hon. Minister Robert Flack, Ministry of Municipal Affairs and Housing

By email: [minister.mah@ontario.ca](mailto:minister.mah@ontario.ca), [Minister.SOLGEN@ontario.ca](mailto:Minister.SOLGEN@ontario.ca)

CC: Hon. Attorney General Doug Downey, Ministry of the Attorney General

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

Dear Solicitor General Kerzner and Minister Flack,

We are writing to share our comments on the proposed New Regulations under the Measures Respecting Premises with Illegal Drug Activity Act, 2025 (MRPIDAA). We continue to be deeply concerned about the impact of MRPIDAA and strongly urge the province to repeal the Schedule in Bill 10.

**Summary**

We appreciate the government's acknowledgment that public and nonprofit landlords serving vulnerable communities must be exempt from MRPIDAA, given the insurmountable tensions between their work and the legislation. While it is a step in the right direction, it is not enough to curb our network's ongoing concerns about MRPIDAA:

- Decrease in rental housing options for Ontarians because of perceived "risky renters", causing a domino effect on Ontario's nonprofits.
- Decrease in commercial spaces for nonprofits providing essential program and services to Ontarians because being perceived as "risky nonprofits"
- Lack of clarity on how prescribed offences are different from existing federal legislation.
- The underlying issue with MRPIDAA still persists.

Repealing MRPIDAA, rather than crafting multiple pathways to curb the negative impacts of the Schedule, is the best viable solution for all. It enables nonprofits to safely continue their work caring for vulnerable communities, private landlords to meet housing market needs, and commercial landlords to meet commercial space market.

**Detailed Comments on the proposed definition of landlord**

Decrease in rental housing options for Ontarians because of perceived "risky renters", causing a domino effect on Ontario's nonprofits.

Greater risk aversion given MRPIDAA's fines and proposed offences, will reduce landlords' willingness to rent to individuals exiting homelessness, struggling with mental health concerns, and/or addictions. This will disproportionately impact Ontarians in rural and northern Ontario, and other communities where alongside nonprofits, small to medium sized landlords make up a large part of the nonmarket rental housing market.

Reduced access to housing options will not only drive up demand for nonprofit nonmarket housing options, but also contribute to more unsheltered situations and increased public drug use, outcomes we all seek to prevent. Evictions and lack of lease renewals may cause an increase in backlogs at the Landlord Tenant Board.

Ontarians need housing options across the housing spectrum. Without viable options, MRPIDAA will make it more difficult to permanently leave supportive and transitional housing programs.

Decrease in commercial spaces for nonprofits providing essential program and services to Ontarians because being perceived as "risky nonprofits"

Greater risk aversion given MRPIDAA's fines and proposed offences, will reduce commercial landlords' willingness to lease to nonprofits serving vulnerable Ontarians. The proposed definition of "landlord" does not address the issue of commercial landlords who maintain leases with nonprofits serving vulnerable communities. According to ONN's 2024 State of the Sector survey, 71 per cent of nonprofits in Ontario do not own the spaces they operate in. Rather, they rely on commercial landlords to lease space for operating and delivering programming and services. This includes nonprofit drop-in centers and any arts, culture, and heritage events. As a result commercial space options will shrink for essential programs and services.

MRPIDAA's impact on the commercial lease market is already being felt by nonprofits across Ontario. Commercial landlords are citing bill 10 to refuse lease renewals with "risky nonprofits", terminate leases before they are up with "risky nonprofits", and unduly download administrative and financial burden to take "reasonable measures" in monitoring and controlling "criminal activity" by tenants. Nonprofit lessees of commercial spaces continue to be forced into a policing and enforcement position which undermines their foundation of trust and communication with communities.

### **Detailed Comments on the exploration of prescribing in regulation offences under MRPIDAA**

Lack of clarity on how prescribed offences are different from existing federal legislation.

The proposed prescribing offences in the regulation under MRPIDAA to relate to production without authorization of a controlled substance or precursor as captured in section 7.1 (1) (a) of the Controlled Drugs and Substances Act (CDSA), lacks clarity in purpose. It duplicates what is already in effect under [federal legislation](#), thus begging the question of the intended goal of MRPIDAA and how it materially improves existing legislative and regulatory tools available under the Criminal Code and nuisance or property law.

#### Underlying issue with MRPIDAA still persists

For landlords be held accountable for “knowingly permitting illegal drug production and trafficking on their premises” is impossible because:

- How are landlords realistically expected to monitor or “police” tenant or third-party behaviour within leased premises?
- What specific actions would constitute reasonable compliance by a landlord acting in good faith?
- How will the legislation apply where activity occurs without a landlord’s knowledge or control?
- In multi-tenant residential or commercial buildings, how will responsibility be assigned when issues arise in common areas or adjacent units?
- What prevents this framework from incentivizing defensive, exclusionary rental practices?

Not only will small to medium sized landlords struggle to comply with MRPIDAA, but also the responsibility of compliance will be downloaded from commercial landlords to nonprofits leasing from them, if at all.

#### **Conclusion**

As a sector that employs and serves diverse communities, nonprofits play a key and distinct role in caring for Ontarians. The nonprofit sector should be enabled to conduct their work, not hindered. We remain ready to work collaboratively with government to advance balanced, evidence-informed solutions that support both nonprofits and the communities they serve. We support the province’s repeal of MRPIDDA, given the challenges it is posing.

Sincerely



Pamela Uppal-Sandhu  
Co-Executive Director (Interim), Director of Policy  
Ontario Nonprofit Network

**About ONN**

ONN is the independent nonprofit network for the 58,000 nonprofits in Ontario, focused on policy, advocacy, and services to strengthen Ontario's nonprofit sector as a key pillar of our society and economy. ONN works to create a public policy environment that allows nonprofits and charities to thrive.