



March 5, 2026

Submitted electronically to: <https://www.regulatoryregistry.gov.on.ca/submit-comment/53274>

The Honourable Michael Kerzner  
Ministry of the Solicitor General  
Strategic Policy Division  
25 Grosvenor Street  
Toronto, ON M7A 1Y6

Dear Minister Kerzner,

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

Landlord's Self-Help Centre (LSHC) is a community legal clinic funded by Legal Aid Ontario that provides information and education to small landlords across Ontario. We primarily assist owner-occupied landlords who rent up to three units in their homes. Our clients are often seniors, newcomers, people with disabilities, and individuals who rely on rental payments to supplement their income. These individuals are not professional housing providers; rather, they are small property owners navigating a complex regulatory environment.

LSHC supports the Government of Ontario's efforts to address illegal drug production and trafficking in communities. However, the proposed regulatory framework under the *MRPIDAA* may create unintended consequences for small landlords if not carefully implemented. The regulations would prohibit landlords from knowingly permitting premises to be used for illegal drug activity and introduce new enforcement powers and penalties. While improving public safety is important, the framework places additional expectations on small landlords to monitor and prevent criminal activity on their properties. It also creates a separate regulatory regime outside the *Residential Tenancies Act*, potentially exposing landlords to additional costs and penalties that many small landlords may struggle to manage.

**LSHC strongly recommends adding owner-occupied small rental housing with up to three units within the same property to the list of potential exemptions from the definition of "landlord."**

**1. Limited Capacity of Small Landlords**

Most small landlords lack the resources of large property management companies. Owner-occupied landlords reside on the same property and may lack the expertise to identify or investigate suspected illegal drug activity. The proposed regulations risk placing unrealistic expectations on small landlords to act as quasi-law enforcement.

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## **2. Risk of Unintended Discrimination**

If small landlords face penalties for “knowingly permitting” illegal activity, they may increase tenant screening or avoid higher-risk applicants. This could contribute to housing discrimination against individuals already facing barriers, including those with addiction or mental health challenges.

## **3. Overlapping Responsibilities with Existing Laws**

The *Residential Tenancies Act* already provides mechanisms to address illegal activity in rental units, including eviction where tenant actions endanger safety or infringe lawful rights. Introducing an additional legal regime may create confusion for small landlords about required steps, reporting obligations, eviction procedures, and potential liability if enforcement actions are delayed.

## **4. Potential Financial and Legal Risk**

The proposed new regulations introduce significant penalties for individuals and corporations who are found to have knowingly permitted illegal drug activity, including substantial fines. For small landlords renting a basement apartment or spare unit, exposure to such penalties could have devastating financial consequences. Without clear safeguards or adding small landlords to the potential exemptions, the legislation may deter individuals from renting out parts of their homes, reducing the already limited supply of small-scale rental housing in Ontario.

## **5. Safety Risks for Owner-Occupied Small Landlords**

Owner-occupied small landlords who reside on the same property as their tenants, often renting basement units or apartments within their homes, can be in a vulnerable position when illegal activity occurs. If illegal drug production or trafficking is suspected, these landlords may face serious personal safety risks if they are expected to confront tenants or intervene in criminal activity.

Unlike large property management companies, small landlords typically do not have security personnel, legal departments, or property managers to address potentially dangerous situations. Many are seniors, newcomers, or individuals with disabilities renting part of their homes to supplement their income. Expecting them to monitor or intervene in suspected drug-related activity may place them at risk of harm or retaliation. Any regulatory framework should therefore recognize that small landlords, particularly those residing on the premises, should not be expected to investigate or directly confront criminal activity themselves. As such, they should be added to the list of potential exemptions from the definition of “landlord.”

LSHC would welcome the opportunity to provide further input or participate in future consultations regarding the implementation of this legislation.

Sincerely,  
**Landlord’s Self-Help Centre**

*Diana Padierna*

Diana Padierna  
Executive Director