

May 1st, 2025

City of Toronto
100 Queen St W,
Toronto, ON M5H 2N3

Dear Mayor, City Manager, and Councillor of Toronto:

**Re: Charter Concerns Regarding the Proposed Demonstrations Bylaw to
Protect Vulnerable Institutions**

We are writing to express our deep concern with the proposed by-law limiting protests in Toronto. We oppose the adoption of any by-law that infringes on *Charter*-protected rights to freedom of expression, peaceful assembly, and association.

The Advocacy Centre for Tenants Ontario (ACTO) is a community legal clinic funded by Legal Aid Ontario dedicated to advancing tenant rights across Ontario. Central to our mission is the recognition of the right to housing for tenants. We believe this proposed by-law will severely impact *Charter* freedoms and, by extension, our ability to support tenants in Toronto — home to nearly half of all tenants in Ontario.

Impact on ACTO and the Communities We Serve

ACTO's work depends not only on legal advocacy in the courts and tribunals, but also on building and supporting campaigns that improve legal protections and housing policy. Our signature achievement — a decade-long campaign resulting in the Government of Canada recognizing housing as a human right in 2019 — was made possible by the lawful exercise of public demonstrations.

ACTO, along with a broad-based coalition of tenant-rights groups, hosted annual National Housing Day events where groups from across the province would gather at Queen's Park and elsewhere in the city. We demanded that all Canadians should have access to safe and affordable housing. These rallies included symposiums, memorials for unsheltered individuals and a march that travelled along major Toronto streets. These rallies brought urgent attention to the pressing issue of the lack of affordable housing in the city and province. Without the ability to freely organize and gather in public spaces, that monumental victory of a National Housing Strategy and legislative recognition of the right to housing would not have been possible. Furthermore, this mass mobilization eventually led to city adopting its Housing Charter.

The proposed by-law will impede tenants in Toronto from taking to local streets and public spaces to pressure governments and landlords to uphold their right to housing and security of tenure. The by-law risks criminalizing, smearing and inhibiting housing justice movements — especially those led by racialized, low-income, newcomer, and disabled tenants who most rely on these rights to overcome systemic barriers to justice. In effect, the by-law would further silence Toronto's most marginalized communities.

For the many tenant associations, legal clinics, and non-profit organizations, free assembly, association, and expression are critical tools for resisting renovictions, challenging bad-faith “own-use” evictions, opposing the demolition of affordable housing, and bringing public attention to exploitative Above Guideline Rent Increases and rent gouging. A by-law that restricts public demonstrations would only shackle the essential work needed to combat predatory rental housing practices, while providing unscrupulous landlords with greater license to exploit and displace tenants.

More broadly, social justice advancements — including efforts to address housing rights, but also poverty, ableism, sexism, racism, and more — have always used public demonstrations. These often occur near institutions of influence such as government offices, religious sites, or symbolic public spaces relevant to the issue. Restricting where demonstrations can occur would disproportionately silence the very groups who already face systemic exclusion from traditional avenues of power.

Conclusion

We recognize the City's responsibility to protect communities from *bona fide* hate, harassment and intimidation. There must be initiatives to safeguard minority and vulnerable communities in Toronto. However, political speech is not hate speech. The framing of the proposed by-law suggests an overly broad approach that risks criminalizing lawful protests — particularly protests by racialized and minority communities, many of whom are disproportionately renters themselves.

Toronto has a proud tradition of civic engagement and human rights leadership. The proposed by-law threatens to effectively end this tradition by weakening the *Charter* rights Torontonians rely on to defend their homes, communities, and dignity.

We urge City Council to reject any proposed by-law that places undue restrictions on public demonstrations. Instead, we call on the City to reaffirm its commitment to fundamental freedoms — ensuring that all Torontonians, especially the most marginalized, retain their right to be heard.

Sincerely,
Advocacy Centre for Tenants Ontario
per:

A handwritten signature in blue ink, appearing to read 'Douglas Kwan', with a long horizontal stroke extending to the right.

Douglas Kwan
Director of Advocacy and Legal Services