

[councilmeeting@toronto.ca](mailto:councilmeeting@toronto.ca)

May 20, 2025

Re: Item 2025.CC30.5- Proposed By-law Amendment to Provide Access to Social Infrastructure, before City Council on May 21, 22, and 23, 2025

Dear Mayor Chow and Toronto City Councillors

OCASI - Ontario Council of Agencies Serving Immigrants is writing to express our concerns about the proposed by-law amendment known as the “Bubble Zones” by-law.

OCASI - Ontario Council of Agencies Serving Immigrants was established in 1978 as the collective voice of immigrant and refugee-serving agencies in Ontario and to coordinate responses to shared needs and concerns. OCASI has 252 members across Ontario, of which 141 agencies - more than 50% - are in Toronto.

Peaceful protests, demonstrations, and vigils are at the core of free expression in a democratic society such as Canada. The strength of civil society organizations, such as OCASI member agencies, depend on the right to free speech and freedom of assembly. These are fundamental rights under the Canadian Charter of Rights and Freedoms. Limiting this right threatens the very foundations of civic engagement and democratic accountability.

Among the recent peaceful protests, demonstrations, and vigils in which OCASI member agencies, their clients and employees have participated are those which called for shelter, services, and support for African refugee claimants left to fend for themselves on the streets of Toronto; calls for regularization of immigration status; as well as many more peaceful public events regarding domestic and global human rights concerns.

While the stated aim of the by-law is to protect access to “Social Infrastructure” (schools, childcare centres, and places of worship), it has wide-ranging reach that could result in far broader and unintended consequences. Among those consequences are the potential additional scrutiny or harmful impacts on individuals and communities who are already made vulnerable because of demographic identity such as race, and factors such as immigration status and other structural and systemic disadvantages.

Below are some of our concerns:

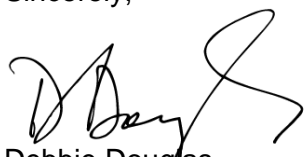
- The by-law is unnecessary. Many of the concerns the by-law aims to address are already covered by other provisions, including the Criminal Code.
- The by-law is unconstitutional as it contravenes the Charter of Rights and Freedoms.

- The language in the by-law is vague, which can result in misapplication, overreach and have much broader and harmful impacts, particularly on vulnerable communities.
- The majority of Torontonians who participated in City of Toronto consultations have said they are not in support of this by-law. The [report](#) from the City's public consultation identifies the following concerns from participants about the by-law, that it would:
  - infringe on Charter-protected rights
  - limit freedom of speech and peaceful assembly
  - have enforcement issues
  - disproportionately impact marginalized communities
  - duplicate existing laws

OCASI is a signatory along with other civil society organizations in a joint letter organized by Social Planning Toronto (SPT). We recognize and appreciate SPT's leadership on this important issue.

The right to be seen and heard in public spaces is important for everyone. Especially those who have been historically marginalized and continue to experience structural and systemic discrimination. The right to free speech and freedom of assembly are central to our democracy. We urge you to protect that right, and call on you to reject this overreaching bylaw.

Sincerely,



Debbie Douglas  
Executive Director