

**Remarks to the  
City of Toronto's  
Licensing and Standards Committee  
on the proposed Multi-Residential Apartment  
Building (MRAB License)**

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November, 30, 2016



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**Members of the Licensing and Standards Committee:**

Thank you for permitting me time to speak to the important issue of the proposed Multi-Residential Apartment Building License.

My name is Margie Carlson and I am the Deputy Executive Director of the Ontario Non-Profit Housing Association. Our association represents over 700 community-based non-profit housing providers throughout the province, including those that operate in the City of Toronto. For nearly 30 years we have been providing our members with education, member support, research, policy support, and group procurement services.

In October 2016, ONPHA was pleased to make a submission to the City's consultations on the proposed landlord licensing framework on behalf of the Toronto Network of Non-Profit Housing Providers. This network is committed to the provision of decent, well-maintained affordable housing for low- and moderate-income households. The members of this network own and manage almost 75,000 social housing units in Toronto. Many of the network's members operate multiple buildings within Toronto, and several provide specialized housing and support services for tenants who need help to enjoy a successful tenancy.

The premise of the City's proposed licensing program is "Every tenant deserves a safe, secure and decent place to live". As an association that represents Ontario's social housing providers, we agree with that sentiment wholeheartedly. Many of the landlords that we represent include this goal either in a mission statement or in their Articles of Incorporation. Providing good housing is the very reason for our existence. We believe

that secure, decent and affordable housing is a human right and a fundamental social determinant of health. However, we are concerned that the new landlord licensing proposal has many unintended consequences that will impair our members' ability to carry out their mandates.

First, we believe that the introduction of licensing would make it difficult for non-profit housing providers to operate within overlapping regulatory regimes. The report notes that the majority of non-profit housing providers in Toronto are already accountable to the City through the Shelter, Support and Housing Administration department. That is true, however our membership also spans supportive and transitional housing providers which are administered by the province through the Ministry of Health and Long Term Care or the Ministry of Community and Social Services.

SSHA and the provincial government already have monitoring mechanisms in place and if there are major concerns or issues, both have legal remedies they can follow to address the situation. In effect, including social housing providers in a licensing system means that an alternate approach is needed to ensure there is not overlap and duplication. We want to ensure that there is a clarity of roles so that government departments are not operating at cross purposes.

Our members have worked with SSHA on the Raising the Bar initiative which will introduce common standards, including building standards, for non-profit housing providers. The provincial Ministry of Housing is also considering making standards mandatory for our members across the province. We are concerned that an additional set of requirements creates the danger of multiple parties being involved and setting standards related to a single issue. This will lead to confusion if not managed properly. We support the idea proposed in the report that will promote City departments working together with housing providers. This will also need to extend to provincial government departments that work with supportive and transitional housing providers.

Our second concern is that landlord licensing would present significant financial challenges for the sector. Although the proposal notes that user fees will be waived for our members, we still anticipate they will have un-funded costs related to training,

education and implementation of the plans that are being proposed as part of the licensing framework. Unlike the private sector, our members cannot use the Landlord and Tenant Board as an avenue to raise rents to cover increased costs as social housing providers must comply with rent calculation formulas prescribed under the provincial *Housing Services Act* or as determined by the Operating Agreement with a provincial Ministry. Beyond this, non-profit housing providers also must contend with budget limitations, and constraints against raising additional funds or borrowing money. All of these factors will make it increasingly difficult for the non-profit housing sector to develop and follow efficient and cost-effective capital spending plans – a sector which already relies on government to help address its capital repair issues.

Ultimately, we believe that the current Multi-Residential Apartment Building Audit and Enforcement Program is a better model to follow. It has been working well because it:

- 1) Prioritizes buildings with the highest health and safety risks
- 2) Brings inspectors into buildings both to audit and hear tenant concerns
- 3) Works with landlord and tenants to resolve problems
- 4) Creates specific Action Plans to get work done; and
- 5) Promotes tenant and landlord education.

In closing, ONPHA and the Toronto Network of Non-Profit Housing Providers recommends that the City of Toronto continue to monitor, regulate and enforce landlord standards through the mechanisms that are already in place.

As with the City, ONPHA also has a mission to ensure that tenants have a safe, decent and affordable place to live. Going forward, we wish to continue offering expertise, advice and resources to support all initiatives that will reduce homelessness and promote the provision of housing for all people regardless of income.

We look forward to supporting a framework that will help the City and our members achieve our shared goal of improving the quality of life for our most vulnerable citizens and that represents a cost-effective and efficient approach for taxpayers.

Thank you.