

Nov 29th, 2016

Re: Rental Apartment Buildings: Results of Public Consultation and Proposed Regulatory Regime

Toronto is a tenant city – 50% of the population are renters, many of whom live in high-rise apartment buildings.

Tenants are also important taxpayers in the City of Toronto, paying close to 3.6 times the amount that homeowners pay in property taxes. They deserve the best services that the city has to offer.

Unfortunately, too many tenants live in sub-standard housing. The Multi-Residential Audit Building (MRAB) program has found over 58,000 deficiencies in approximately 1,000 buildings. These are mostly limited to just the common areas in buildings, and don't capture the scope of in-suite issues that tenants also face.

These tenants deserve what they pay for.

Landlords have been doing extremely well in Toronto's low vacancy environment: escalating rents and rental profit, above guideline rent increases, and vacancy decontrol have all been inflating their bottom lines. Meanwhile, tenants pay increasingly high rents for apartments that don't even meet minimum standards.

We, the undersigned, have been fighting for almost a decade to force landlords to properly maintain their buildings. Tenants deserve to live in housing that meets these minimum standards and landlord licensing is one way to achieve this.

We are happy with some of the elements of the current proposed program – some new fees and penalties for landlords, requirement for new plans, some increased staff resources, etc. However, we feel that the proposal could be stronger in order to better support tenants.

Specifically, we recommend:

- 1) More resources for inspections and enforcement. Currently the report calls for 30 total MRAB staff, with about 20 of these being Municipal Standards Officers (MSOs). With close to 500,000 rental units under MRAB's jurisdiction, more staff are needed to investigate and force compliance from negligent landlords.
- 2) Stronger monetary penalties for landlords who don't comply. Currently, landlords face weak penalties for property standards violations. As a result, they simply ignore the penalties as the cost of doing business, as it's cheaper than abiding by the law. We would like it to be cheaper for landlords to be law-abiding than to violate the law.
- 3) A "LiveSafe" rating program for buildings modelled off of the DineSafe program for restaurants. We would like to see Municipal Licensing & Standards follow the direction from City Council on this issue.
- 4) Changes to the property standards by-law to strengthen enforcement, but also to limit the Property Standards Appeals Committee's ability to grant extensions for compliance with the law.

Signed,

Marva Burnett, ACORN President

John Plumadore, Brentwood Towers Tenant Associations

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