

November 13, 2017

Members of the Licensing and Standards Committee
Toronto City Hall
100 Queen St. West
Toronto, ON M5H 2N2

Via email: lsc@toronto.ca

Dear Members of the Licensing and Standards Committee,

On behalf of the members of the Greater Toronto Hotel Association (GTHA) and the Ontario Restaurant Hotel and Motel Association (ORHMA) I am writing regarding the Agenda item LS23.1: Licensing and Registration Regulations for Short-Term Rentals on the City of Toronto Licensing and Standards Committee meeting for November 16, 2017.

As outlined in our letter to the Planning and Growth Management Committee, The GTHA and ORHMA support the creation of a new land use short-term rental "which requires the use to be the principal residence of the operator". However the new definition of short-term rentals does not achieve the desired outcomes without the definition and registration requirements of principle residence and short term rental operator.

The definition of principal residence and the requirement to register as a short term rental operator are the foundation of this regulatory regime.

In the report LS23.1 to Municipal Licensing & Standards Committee there is a recommendation that when registering as a short term rental operator all you need to do to provide proof of principal residence is check a box. No proof that you are renting your principal residence is required upon registration. This registration process may be simple however it will undermine the integrity of the registration process and cause the city significant challenges in the future. It will take more time to go back and correct the system after than to do it right in the first place.

The GTHA and ORHMA recommend a registration process that requires a system that is simple and expect the City uses in other areas of city responsibilities. A simple ask for identification that confirms your principal residence may be a valid driver's license, province issued ID card, electricity bill, property tax bill, natural gas or cable bill. This is not onerous on the home sharing operator and may still be completed online. This simple step will provide all involved with a system with a stronger foundation than proposed. This is not too much to ask for anyone that is complying with the rules and remember you do it once when registering and then simply confirm on each renewal.

The GTHA and ORHMA support an enforcement regime and strict penalties for operators and platforms that do not follow the rules and regulations. In the body of the report we notice that some penalties are written and some are yet to be developed. We look forward to reviewing the penalties as they become public.

It is also important to make sure that the city must not delegate approval of the registration of home sharing operators and platforms to third party providers. This is the enforcement of city rules and regulations and should not be delegated to any external group.

Finally, the GTHA and ORHMA are concerned with the amount of days that a home sharing operator can rent out their property which has been suggested at 180 days. We recommend that in line with other jurisdictions across the world this cap be reduced to 90 days.

Subject to that we request that at the end of the first year the City provide a report summarizing the activity of the home sharing operators and platforms in a form that provides detail on the impact of the new regulatory regime and to determine if policy changes are required.

Thank you for the opportunity to provide input into the home sharing economy consultation process.

Regards,



Terry Mundell
President & CEO
Greater Toronto Hotel Association
Lobbyist #: 11597S

Regards,



Tony Elenis
President & CEO
Ontario Restaurant Hotel & Motel Association