



Centre for Equality Rights in Accommodation  
Centre pour les droits à l'égalité au logement

November 20, 2019

Re: Deputation to Toronto City Council Subcommittee on the Preservation of Affordable Rental Housing

Good evening councillors, staff, advocates and residents of Toronto.

My name is Alyssa Brierley and I am the Executive Director of CERA – the Centre for Equality Rights in Accommodation. Here with me is Annie Hodgins who, for the past 6 years, has run our Eviction Prevention and Housing Stabilization Program.

CERA has provided services to some of the most vulnerable Ontarians and Torontonians during its 32-year history, and we started our Eviction Prevention work twenty years ago, when the concept of eviction prevention was not widely understood or discussed as it is today. As early adopters and long-time leaders in the eviction prevention space, CERA continues to provide free services to Toronto residents facing eviction or a human rights violation in their housing that may threaten their ability to stay in their home.

We are pleased that the City is taking concrete steps to address the urgent need to protect affordable housing stock and address the role of evictions play in preventing people from accessing or staying in safe and adequate housing. We welcome the creation of this subcommittee to protect existing affordable rental housing encourage you to seize the opportunity it provides to address our housing crisis. We have four recommendations for your consideration:

First, the City must adopt a human rights-based approach to tackling the systemic failures that are leading to housing precarity and homelessness. This means that decisions about programming, funding and policy must begin with the fundamental starting premise that all Torontonians have the right to an adequate home so that they can live a life of dignity.

Illegal evictions are gross human rights violations and must be taken seriously. Some of our most vulnerable residents are losing their homes because there's a remarkable opportunity for owners of those properties to profit. That is shameful and not commensurate with a society that values human rights and dignity. As such, we urge this subcommittee to be bold in its approach. Use every tool at your disposal and ensure intersectional collaboration to address this problem. The External Advisory Group that was struck for the purpose of advising the development of the Housing Plan was highly effective and we recommend a similar structure and approach here.

Our second recommendation for the City is to expand the mandate of this committee from addressing illegal N12s and N13 evictions to include all predatory evictions, and address the root cause of these evictions, which is a failure of the housing market to provide decent and affordable housing options to all people, particularly our lower income and most vulnerable residents.

At CERA we know from our extensive experience in eviction prevention that it is not only N12s and N13s that are being misused by landlords in the current context. There has been a marked trend of landlords taking any chance they can get to evict tenants with N4s and N5s for small indiscretions that would be overlooked in a cooler rental housing market.

*Importantly, it is lower income and more vulnerable residents who are exposed to the latter type of eviction threat most often and are the most likely to become homeless as a result.*

We hear about this every day on our telephone hotline. Let me provide some examples:

- A tenant received an N5 eviction notice for damage resulting from a cooking accident
- A senior tenant in poor health received an N4 for non-payment of rent after being discharged from the hospital
- A single mom, who has paid their rent on time for years and has otherwise been a reliable tenant, falls behind one month and receives an N4.
- Just today, we heard from a senior on a fixed income who could become homeless because their landlord is filing an Above Guideline Increase and she will not be able to afford the new rent and will receive an N4.

Every day we hear from people who are being evicted to make room for new tenants who will pay more for the same unit. When they are evicted, they often quite literally have nowhere to go. Imagine paying \$700 a month in rent for your home for decades and face eviction into a market in which the average price of a one-bedroom apartment is \$2200. This is the situation that low income and vulnerable renters in Toronto are facing and we hear about it every day.

Third, the City must collect coordinated, meaningful, and comprehensive data about housing insecurity and take measures to address it on a systemic level as opposed to the current case-by-case basis approach. In order to properly allocate resources and address real needs, data should be collected to track predatory landlord behaviour, tenant displacement, increases in rent above the provincial guideline and changes to short-term rental stock.

Finally, the city must increase funding to the under-funded housing services sector, allocating funds that are in proportion to the size and impact of current problems. We need affordable housing, but we also need increased and better coordinated services to address the needs of those facing housing insecurity and homelessness right now. Over the past decade, CERA has watched as the circumstances of people who call our eviction prevention hotline have become progressively complex, urgent, and desperate. Toronto residents regularly tell us that there is an urgent need for increased services to assist them.

In an evaluation of our services completed last month, 87% of CERA's clients said that we helped them stabilize their housing and 95% said that more services like ours should exist. Yet,

while the need for services has only increased, funding for these much-needed services has flatlined. For the fifth year in a row, our city-funded program, which has never been provided with enough funds to cover its operating costs, has been extended for another year without sufficient funding. As a result, I will be meeting with our Agency Review Officer next week to negotiate a reduction in our service levels because I can't make the numbers work.

This is the opposite of what should be happening – we should be investing in these services, not starving them. CERA and our colleagues have the skills and expertise to address the needs of those facing housing insecurity right now, but what we need are the resources and the support from you to provide these essential services.

I'd like to conclude on a more upbeat note and recognize the leadership and contribution of the many people who are here in this room and are dedicated to making the lives of Torontonians better through their work to address the housing crisis. This includes the members of this Committee, city staff, civil society and others. We're all here because we are deeply concerned about this issue and I'm confident that we can work together to make things right.

Housing insecurity and homelessness are some of the most significant human rights challenges of our time. We must be bold and use every tool at our disposal. This subcommittee is an important first step and we look forward to working with you on this.

Thank you

A handwritten signature in black ink, appearing to be 'AB', with a large, stylized flourish at the end.

Alyssa Brierley