



June 7, 2016

Re: LS11.3 MRAB Audit & Enforcement Program - 2015 Annual Report

Congratulations to Ms. Cook and the MLS and MRAB teams.

The operational enhancements undertaken in 2015 to improve efficiency and increase the impact of the MRAB program on the quality of rental housing have been very effective.

As the report notes, "These enhancements focussed on resolution and escalated enforcement, increased landlord engagement, new collaborations with stakeholders and a city-wide tenant education campaign."

The Greater Toronto Apartment Association and our members who own and manage over 150,000 units are proud of our input into these enhancements that have resulted in significant compliance improvements. The pre-audit assessment process and the more transparent MRAB program have both been useful in improving conditions. This is an excellent example of how industry collaboration with MLS has worked.

This is a great improvement from pre-2015 MRAB, when the City's Corporate Audit Division confirmed to GTAA that for many years, MRAB inspectors worked only with blank sheets of paper and essentially recalled requirements from memory as they walked through apartment buildings. Your revamping and formalization of the process is well received as it is considerably more transparent and consistent – especially versus blank sheets of paper and memory. The introduction of these new practices at the end of 2014, and through the entire year in 2015 have resulted in overall improvements.

The report states that at the end of 2015, there is 92% compliance in privately-owned buildings.

The report highlights the effectiveness of aggressively using the enforcement tools that are available. There are several case studies that clearly show how landlord engagement works. And if and when it doesn't the examples detail how the City was able to get the remediation completed at the owner's expense and fines through prosecution.

GTAA shares the same goals as the City. Our members completely support the City's efforts to go after negligent building owners. They mar our industry. We believe that aggressively focussing on the bad operators and using the enforcement tools that have proven to be effective is the best course of action.

Again, the current tools when used in a focused manner are very effective. 92% compliance is good, but there is still work to be done.

The Greater Toronto Apartment Association is a conduit for best practices, education and training. We are, as always, available to help to improve the quality of rental housing across the City by working in collaboration with City officials.

Once again, congratulations for improving MRAB. Some ongoing fine tuning will generate even better results.

Regards,

A handwritten signature in blue ink, appearing to read 'Daryl Chong', with a stylized flourish at the end.

Daryl Chong
President & CEO
Greater Toronto Apartment Association