



Advocacy Centre for Tenants Ontario
Centre ontarien de défense des droits des locataires

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**SUBMISSION TO THE
EXECUTIVE COMMITTEE OF THE CITY OF TORONTO**

**REGARDING
REGULATING SHORT-TERM RENTALS**

ITEM EX 18.12

October 26, 2016

SUBMISSION TO THE EXECUTIVE COMMITTEE OF THE CITY OF TORONTO ON REGULATING SHORT-TERM RENTALS - ITEM EX 18.12

This submission is made on behalf of the Advocacy Centre for Tenants Ontario – a community legal aid clinic with a provincial mandate to advance and protect the interests of low-income tenants.

Ontario has an affordable housing crisis. The City of Toronto is bearing the brunt of this crisis. Students, low-income workers and other vulnerable residents are struggling to find a place to live. The City of Toronto essentially prohibits conversions, renovations and demolitions of rental housing that displace tenants. This recognizes the reality that we will never meet our housing needs if we permit the erosion of the existing supply of rental units.

Meanwhile, people from all over the world are coming to Toronto to visit. We have made significant investments in tourist attractions and in making sure the world knows about them. Council has zoned large areas of the City so as to provide commercial accommodation to visitors. Many visitors stay with friends and relatives in their homes while they are visiting. In between these two types of tourist accommodation, an industry has grown up. It is based on electronic reservation, payment and monitoring of accommodation for visitors in residential premises. But this industry appears to be having negative side-effects for those people struggling to find a home to rent.

The staff report points out that there is a wide variety in the form of accommodation offered by this industry. “Non-primary residences” is the term used in the report for what we would call “rental units”. Where short-term rentals are occurring in these non-primary residences, these rental units are not occupied by Toronto tenants. In effect, landlords are changing the residential use of their properties to a commercial hotel-like use. If unchecked, this will further erode the supply of rental housing and make our housing crisis worse. This may already be occurring. We would note that only 28% of the 2015 Airbnb listings were by a host with a single listing that rented for fewer than 31 nights. The rest of the listings do not neatly fit into the model of “occasionally sharing a room in one’s home”. We have also heard of efforts to evict low-income tenants in order to convert their long-term rental units into temporary Airbnb units.

In its efforts to balance the competing goals of regulation discussed in the staff report, we believe that efforts to “Prevent substantive decrease of availability and affordability of rental housing” must be primary. We strongly support detailed research into the impact of short-term rentals on the rental market and particularly the focus on housing for vulnerable residents – seniors, youth, people with disabilities and people with very low incomes.

We welcome the opportunity to participate in further consultation, but we expect the City to continue in its efforts to stand up for its residents who need safe, stable and affordable housing the face of new economic pressures that are reducing the supply of long-term rental units.