



Date: April 14, 2016

To: Councillor Palacio, Chair, Licensing and Standards Committee
Members, Licensing and Standards Committee

RE: **LS10.2 Proposed Multi-Residential Rental Building License**

At the June 25, 2015 Licensing & Standards Committee meeting, the staff report titled "*Jurisdictional Scan and Alternatives to Licensing Landlords*" notes:

"This report provides only a preliminary overview and draws no conclusions on licensing landlords in the City of Toronto."

And,

"Municipal Licensing and Standards has identified that more work is needed, including issue identification, public and stakeholder consultation and performing cost analyses."

The report identifies several reason why licensing is not necessarily the best option. It concludes with:

Continued Research and Issue Identification

Staff will deepen its jurisdictional scan to identify best practices and explore the main issues affecting rental housing in the City of Toronto. This research will define the scope and goals of the consultations.

Detailed Financial Analysis

This will include an analysis of user fees for the MRAB program. This may include a financial analysis of other regulatory options for rental properties in Toronto.

Stakeholder and Public Consultation

Municipal Licensing and Standards will engage in extensive consultation with key stakeholders including tenant advocates and landlords to assess the challenges and opportunities of regulating residential rental properties. The consultation methods may include broad consultations, focus groups and online surveys.

Report Back to Licensing and Standards Committee

Staff will analyze the results of the research and consultation and make recommendations to Licensing and Standards Committee.

On February 24, 2016 at the Tenant Issues Committee, Municipal Licensing & Standards staff overviewed a complete landlord licensing regime. The "*Proposed Multi-Residential Rental Building Licence*" presentation outlines detailed parameters and a roll-out schedule.

May 19, 2016

Report to L&S Committee, recommending that a Multi-Residential Rental Property Licence be developed for implementation in January 2017

Summer 2016

Public and stakeholder consultation and draft licensing bylaw

August/September 2016

Report to Tenant Issue and L&S Committee with draft Licensing By-law

January 2017

First phase of licensing begins

There hasn't been sufficient analysis to justify rental building licensing. In 2008 City Council voted in favour of the creation of MRAB instead of licensing. There are many reasons against licensing contained in the *Regulatory Strategy for Multi-Residential Apartment Buildings* ML&S staff report (October 27, 2008).

Respectfully, the following changes to the current Recommendations are requested:

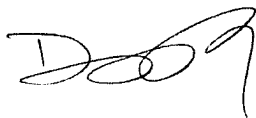
1. City Council direct that current initiatives to **CONSIDER** (deleting "create") a licensing regime for owners of multi-unit residential buildings be termed "RentSafe", and that all future Staff Reports and City communications regarding this initiative use this term.

And add,

4. The Executive Director, ML&S report to the May 19, 2016 meeting of the Licensing and Standards Committee with a detailed analysis including the following:
 - a. A comparison of the proposed licensing regime and the existing MRAB Program;
 - b. A comparison of the tools available to the city to ensure compliance with relevant municipal by-laws under the proposed licensing regime and the existing MRAB Program; and,
 - c. Other non-licensing approaches to improve the effectiveness of the MRAB Program.

The Greater Toronto Apartment Association supports the City's efforts to aggressively pursue poor and negligent operators. We offer our assistance in achieving this common goal. We support the use of all tools that are currently available to achieve this. We ask that you focus your attention on the bad operators instead of creating a new time consuming and costly licensing system.

Sincerely,



Daryl Chong
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Greater Toronto Apartment Association

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