



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

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**Deputation to Toronto Licensing and Standards Committee**  
Meeting of Thursday, May 19, 2016  
Committee Room #1, City Hall

**Agenda item LS11.3 – Multi-Residential Apartment Buildings (MRAB) Audit and Enforcement Program - 2015 Annual Report**

My name is Kenn Hale, and I am the Director of Advocacy and Legal Services with the Advocacy Centre for Tenants Ontario. ACTO is a community legal clinic, funded by Legal Aid Ontario. We provide a broad range of legal services to low-income tenants across Ontario with an emphasis on systemic issues. Our clinic also coordinates the Tenant Duty Counsel Program across Ontario which provides legal information and assistance to self-represented tenants appearing at the Landlord and Tenant Board.

ACTO completely supports the idea in the staff report that the \$53.00 witness fee for Municipal Standards Officers should be waived when they are summonsed to present evidence on behalf of a tenant at the Landlord and Tenant Board. The combination of the witness fee and the \$45 filing fee for a repair application creates a barrier for many tenants who are trying to get their landlords to meet the applicable housing standards – a goal shared by the City. There is also a significant administrative cost to processing these small payments. We hope that the recommendation in the staff report that the Executive Director of ML&S be given the authority to waive these fees means that this will become a routine practice.

Your Committee has requested that pre-determined timelines be developed for compliance with City work orders. The staff response is that Municipal Standards Officers should continue to be permitted to exercise their own discretion in setting deadlines for landlord compliance. While we understand that it may be impractical to create rigid rules, we think that standard timelines can be set for a great number of deficiencies with the informed input of the MSOs. That would send a strong message to both building owners and tenants that the City is serious about addressing disrepair in tenants' homes. It would also allow the MSOs to provide clear communication to tenants about how the compliance process will unfold and provide them with some assurance that landlords will not be allowed to indefinitely flout orders to correct disrepair.

We should also keep top-of-mind that it is the affected tenant who should be at the centre of MRAB enforcement activities as it is their home and their well-being that is at stake. For that reason, we'd like to see MRAB performance measures going forward include qualitative information on the level of tenants' satisfaction once ordered repair and maintenance matters are resolved.