

**Submission to the
City of Toronto's
Licensing and Standards Committee
on Toronto's New Bylaw for Apartment Buildings
(LS17.1)**

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ONTARIO NON-PROFIT
HOUSING ASSOCIATION

LS17.1.5

Members of the Licensing and Standards Committee:

Thank you for this opportunity to submit comments on the recommendations proposed for Toronto's New Bylaw for Apartment Buildings.

The Ontario Non-Profit Housing Association represents over 700 community non-profit housing providers through the province, including providers that operate several thousand units in the City of Toronto. For nearly 30 years we have been providing our members education, research, government relations, policy support, and group procurement services.

We are submitting these comments on behalf of the Toronto Network of Non-Profit Housing Providers. This network is committed to the provision of decent, well-maintained affordable housing for low- and moderate-income households. The members of this network own and manage almost 75,000 social housing units in Toronto, which represents about 25% of the total rental stock in the City. The majority of the network's members operate multiple buildings within Toronto, and many of them provide specialized housing and support services for tenants who need help to enjoy a successful tenancy.

The premise of the City's proposed licensing program is "Every tenant deserves a safe, secure and decent place to live". As an association that represents Ontario's social housing providers, we agree with that sentiment wholeheartedly. Many of the landlords that we represent include this goal either in a mission statement or in their Articles of Incorporation. Providing good housing is the very reason for our existence. We believe

that secure, decent and affordable housing is a human right and a fundamental social determinant of health.

In October 2016, ONPHA made a submission to the City's consultations on the proposed landlord licensing framework on behalf of the Toronto Network of Non-Profit Housing Providers that highlighted concerns about unintended consequences that would impair our members' ability to carry out their mandates. We also submitted a deputation on the same topic to the Licensing and Standards Committee in November 2016 as the proposal was under consideration. We remain concerned about these issues with the newly proposed recommendations.

Additionally, while we are pleased to see that Municipal Licensing and Standards has recommended that associated fees be waived for social housing providers, we believe that there has been an unintended omission.

Over the next 20 years, all of the formerly federal or provincially administered housing programs will reach the end of operating agreements (EOA), with some having reached this point already. When an organization reaches EOA it essentially means that their mortgages are paid off and that they are no longer under any obligation to provide affordable housing. Many housing providers, however, want to continue to follow their affordable housing mission and to fulfill the obligations set out in their original articles of incorporation which will remain unchanged.

To achieve this, some providers may enter into new agreements with the City if this is an option. Others, however, may introduce self-sustaining models where they provide rental subsidies from their own internal revenues and cease to fall under the administration of any level of government.

The recommendations, as they are currently written, would only exempt affordable housing providers that have an ongoing relationship with government. We believe this is unfair, and we are also concerned that this could result in fees being passed down to tenants which would lessen the affordability of these programs.

As we navigate in a post EOA world, the sector will engage in innovative solutions and approaches that will allow non-profit housing providers to stay true to their mandate of providing affordable housing for those who need it. The City of Toronto must consider this, and move beyond the assumption that a relationship with government is the only model for these organizations.

Therefore, we recommend that the Licensing and Standards Committee introduce a Motion directing the Municipal Licensing and Standards department to draft recommendations for alternative ways of identifying social housing providers for the purposes of being exempted from the new registration fee.

As with the City, ONPHA also has a mission to ensure that tenants have a safe, decent and affordable place to live. Going forward, ONPHA wishes to continue offering expertise, advice and resources to support City initiatives that will reduce homelessness and promote the provision of housing for all people regardless of income.

We look forward to working together to achieve our shared goal of improving the quality of life for our most vulnerable citizens.

Thank you.