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Councillor Paul Ainslie, Chair  
General Government and Licensing Committee  
Committee Room 1, City Hall  
100 Queen Street West  
Toronto, Ontario, M5H 2N2

**Re: GL5.2 Review of Body Rub Parlour and Holistic Centre By-laws - Consultation and Research Findings****Background**

I first became aware of the Holistic Centre and Body Rub Parlour by-law review in early 2018, after a group of holistic practitioners reached out to me with their concerns regarding Municipal Licensing and Standards (MLS) bylaw enforcement practices. The workers articulated that the City's approach to enforcement exploited the specific vulnerabilities of holistic practitioners, who were not fully informed of their rights, and protections. Workers described being financially penalized for such acts as keeping family altars with ceremonial wine. These enforcement practices lead to serious complaints, against City By-law Enforcement Officers, alleging cultural insensitivity and targeted racism.

In March 2018, I took the initiative to arrange a meeting between senior staff in MLS by-law enforcement and the practitioners; creating space for both parties to be heard. This enhanced dialogue helped to develop a better understanding between by-law enforcement and the holistic centre industry. The result was an improved relationship between MLS and the holistic industry - as is reflected in the MLS staff report - as well as more effective by-law enforcement for consumers and practitioners.

The City of Toronto licenses over 2,167 holistic practitioners, under the current by-law. The majority of these workers are women over 30, who are new immigrants, and speak English as a second language. As is the case with any newcomer community, the practitioners are still gaining an understanding of their rights and protections in Canada. This unfamiliarity can all too easily lead to a circumstance where the experiences of practitioners are not centred when making decisions which affect their lives and livelihoods. It is important to remember that over 2100 families will be directly affected by any changes that may arise from the by-law review.

As the holistic centre industry is currently under an established licensing regime, at the City of Toronto, it is imperative that the City take all possible steps to ensure that the industry is well-governed, and that the rights and safety of licensed practitioners are deeply considered in the ongoing bylaw review. It is also crucial that holistic practitioners are meaningfully consulted at every stage of the review process.

Additionally, as MLS staff have recommended that the City ensure the health and safety of persons involved in the body rub and holistic centre industries, it is appropriate to apply a public health lens to this review.

## Recommendations

1. Recommendation 1 be amended to read:

City Council adopt the following principles for regulating the body rub industry **and relevant stakeholders**:

- a. Ensuring the **workplace safety**, health, ~~safety~~, and well-being of persons;
- b. Consumer **and worker protection**; and
- c. Ensuring the general well-being of the City of Toronto, including mitigating community impacts.

2. Recommendation 2 be amended to read:

City Council direct the Executive Director, Municipal Licensing and Standards, to report to the General Government and Licensing Committee in the fourth quarter of 2019, with proposed amendments to the Body Rub Parlour and Holistic Centre By-laws that are informed by the principles in Recommendation 1 and include an analysis of the feasibility and impacts of:

- a. Removing the licence requirement for holistic centres and practitioners, **in consultation with holistic centres and practitioners**;
- b. Modernizing the requirements of the Body Rub Parlour By-law, including increasing or removing the cap on the number of body rub parlours permitted in the City of Toronto, **in consultation with holistic centres and practitioners, and body rub parlours and body rubbers**;
- c. Increasing safety requirements for **workers**, in the Body Rub Parlour By-law.

3. That the Executive Director, Municipal Licensing and Standards, consult with the Medical Officer of Health and relevant stakeholders to review any proposed amendments to Chapter 545, Licensing, as they relate to worker and consumer health and safety, and bring forward a concurrent report with findings and recommendations, in the fourth quarter of 2019.

Respectfully submitted,

**Councillor Kristyn Wong-Tam**

Ward 13, Toronto Centre

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