



November 17, 2020

Planning and Housing Committee – Agenda Item PH18.2

Written submissions from the Right to Housing in Toronto (R2HTO)

Dear Members of the Planning and Housing Committee:

We are writing on behalf of the Right to Housing in Toronto (R2HTO), a coalition of organizations and individuals working to support the implementation of the human right to housing by the City of Toronto.

First and foremost, we want to commend the City on using a human rights-based lens, informed by federal, provincial, and city legislation and policies, to shape a comprehensive, city-wide regulatory framework for multi-tenant houses. The proposed framework reaffirms the City's commitment to the progressive realization of the right to housing and we hope that the approach and lens adopted here will act as a precedent for future policy work.

We are very pleased to see the City take a holistic approach to ensuring tenants' rights to safe, adequate and affordable housing. In particular, we welcome the following priorities:

- the serious and proactive consideration given to the risk of tenant displacement;
- the emphasis on tenant safety and adequate housing conditions;
- the commitment to increased support for vulnerable tenants;
- the commitment to increased tenant outreach, education and consultation; and
- the recognition of the necessity of city-wide legalization as a prerequisite for regulatory oversight and the better protection of tenants' rights and safety

We also wholeheartedly agree that the objective of regulatory oversight of multi-tenant houses should prioritize the protection of tenant life and safety, and create adequate, livable, well-maintained and affordable places to live. The pathway to achieving safe, livable and affordable multi-tenant houses starts with legalization, which then enables regulatory oversight and effective enforcement.

Housing Commissioner

We note that the report under consideration today references the absence of a Housing Commissioner function. It is clear from the report that this function, if established, could provide further advice and guidance to the City as they continue to work towards a human-rights based approach to multi-tenant housing. We urge the City to continue moving forward on its commitment to establish an independent

Housing Commissioner function with the power to monitor, claim, and enforce the right to adequate housing across Toronto and the ability to recommend corrective actions to systemic barriers.

The Risk of Tenant Displacement

As mentioned, we are pleased to see the City has recognized the various risks to tenant displacement posed by the proposed regulatory and compliance framework. Plans for mitigating these risks must be prioritized. The cost – to tenants and the public at large - are simply too great to ignore. Given the degree to which equity-seeking groups rely on multi-tenant houses for access to affordable housing, even a small percentage drop in the number of units available, either because operators can't afford the costs of required upgrades or because the rules reduce the number of rooms permitted in a house, could displace hundreds or even thousands of tenants and send them into an inaccessible and unaffordable housing market. Security of tenure for tenants and protection from arbitrary eviction and displacement is essential.

A Rights-Based Approach to Consultations

Right to Housing in Toronto recommends a consultation process similar to that used during the HousingTO process where local organizations receive support to complete local consultations. The goal of these consultations should be to ensure that equity-seeking groups, local support organizations and tenant/landlord organizations are genuinely and meaningfully engaged in a positive and inclusive environment. We agree with the Maytree report findings that consideration should be given to the nature of public discussions so as not to further stigmatize tenants and discourage their participation. We encourage these consultations to be focused, positive, and rights-based. We also recommend this Committee give special consideration to any barriers that might exist to participation in virtual consultations.

The four proposed components of the regulatory and compliance framework for multi-tenant houses have the potential to advance the right to housing for some of Toronto's most vulnerable tenants. The Right to Housing in Toronto recognises and commends the City for taking a rights-based approach in developing this framework. We urge this Committee to continue that good work by adopting the recommendations in the report, and proceeding with a meaningful, positive and inclusive engagement process.

Thank you,

On behalf of the Right to Housing in Toronto