



December 8, 2020

Planning and Housing Committee PH19.6 – RentSafeTO (Apartment Building Standards): Colour-coded Rating System, By-law Amendments, and Program Updates

Dear Members of the Planning and Housing Committee.

We are writing on behalf of the Right to Housing in Toronto (R2HTO), a network of organizations and individuals working to support the implementation of the human right to housing by the City of Toronto. The right to housing includes the principle of habitability – which means the right to housing that is safe, secure, in good repair, free of physical and health hazards, and provides a healthy environment in which to thrive.

We are pleased to see the City continue to move forward on implementing the Apartment Building Rating system (ABRS) and its accompanying components, including the color-coded rating signs. These components of RentSafeTO are important steps towards ensuring tenants across Toronto can claim their human right to safe, adequate and healthy housing. Tenants across Toronto have been waiting too long for the fully implemented RentSafeTO program to be implemented, and we urge members of this Committee to adopt and implement the recommendations under consideration today without further delay.

We are writing today to urge the City to view the proposed recommendations under consideration today through an equity lens and in light of larger issues relating to the protection and development of affordable and adequate housing. Taking steps to address safe, secure and well-maintained housing cannot be separated from larger efforts to secure affordable and adequate housing for tenants across the City.

Once tenants have been forced to vacate units due to uninhabitable conditions, these apartments represent a loss of existing affordable rental housing due to vacancy decontrol which allows landlords to raise rent by an unlimited amount when a tenant vacates an apartment. While increased enforcement

and accountability measures relating to safety, maintenance, and disrepair issues is a worthy endeavour on its own, these measures also ensure the protection of existing adequate housing and prevent displacement of tenants.

In addition to the above, we urge the City adopt an equity lens when considering efforts to enforce maintenance standards and hold landlords accountable for providing habitable and adequate housing. The burden of inadequate and uninhabitable housing is not shared equally among tenants across the City. Over 40% of families living in apartment buildings are low-income, and one in ten Toronto tenants live in housing in need of major repairs.¹ Better data and information are needed to fully understand the extent of housing inequity across Toronto and which communities are carrying the burden of living in unsafe and uninhabitable homes. We urge members of this Committee to adopt the recommendations today that encourage interdivisional and external engagement efforts and explore ways to further incorporate data collection efforts as part of the larger RentSafeTO program and data sharing priorities. It is our understanding the Municipal Licensing and Standards recently added Data Analysts to their team. Going forward, we recommend members of this committee explore ways to make use of these new team members to incorporate data collection and analysis efforts into the proposed 2021 RentSafeTO engagement strategy. We hope this data can be used to better assist the City with an equitable response to the issue of habitable housing among the most affected communities.

Thank you,

Right to Housing in Toronto (R2HTO)

¹City of Toronto. *RentSafeTO (Apartment Building Standards): Colourcoded Rating System, By-law Amendments, and Program Updates*. November 24, 2020..