



Centre for Equality Rights in Accommodation
Centre pour les droits à l'égalité au logement

February 25, 2021

Planning and Housing Committee PH21.12 – RentSafeTO

Dear Members of the Planning and Housing Committee.

CERA has been working to advance the right to housing and rights-based housing policy in Toronto and Ontario for over 30 years. We were founded in 1987 by a small group of Ontarians who were deeply concerned about issues related to housing and tenants' rights. We work directly with tenants across Ontario facing housing-related human rights violations, including a lack of access to safe, secure, well-maintained, and healthy housing.

CERA addressed members of this Committee on December 8, 2020 and expressed our support for the implementation of the color-coded signage component of the RentSafeTO program's Apartment Building Rating System (ABRS). We recommended that any decisions regarding the design of the proposed color-coded signs consider feedback received during public consultations and include clear and prominent language that explained how tenants could report issues relating to the habitability of their housing directly to the City. We noted that tenants need to be made aware of the results from an audit under the ABRS and provided with an opportunity to work with the City to hold their landlords accountable.

We were disappointed and surprised that the implementation of the color-coded rating sign component of the ABRS was not passed. This was despite support from tenants, their advocates, and the overwhelming support from tenant deputants on December 8th. Today's meeting is an opportunity for this Committee to clarify exactly how City staff and Council will ensure all current and prospective tenants will be informed of the rating of their apartment buildings and the evaluation used to create the rating.

At CERA, we work directly with tenants experiencing numerous and ongoing concerns with housing that does not meet basic standards of adequacy and habitability. We routinely hear stories about heating and cooling issues, pests, unsafe and unhealthy conditions in rental units and common areas, maintenance and repair issues, and overall cleanliness. We also hear tenants express their frustration with inadequate enforcement of property standards and maintenance requirements, and a general lack of awareness of the RentSafeTO program.

In addition to the above, we know that 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 A recent report from Social Planning Toronto found that the proportion of buildings with maintenance, repair and safety issues is related to the age of a building, with older buildings more likely to be in need of major repairs.² This statistic is alarming as three quarters of Toronto apartment buildings were built prior to 1991 and almost half were built prior to 1971.³ More than 500,000 Torontonians live in high-rise apartment buildings that are more than 35 years old.⁴

In light of the above, we urge this Committee to continue moving forward on efforts to ensure all current and prospective tenants will be informed of the rating of their apartment buildings and the evaluation used to create the rating. This effort must involve meaningful consultation and engagement with tenants in line with the City's commitment to the progressive realization of the right to housing. Ongoing opportunities to participate and lead efforts to monitor and evaluate the ABRS system for tenants directly affected by inadequate and uninhabitable housing must also be established and supported.

Finally, we wish to reiterate that the ongoing implementation of the RentSafeTO program must be viewed within the larger context of the decades long adequate and affordable housing crisis. When tenants are faced with limited supply of affordable and adequate housing, they may have no choice but to live in uninhabitable housing. We support efforts to clarify the new system Council approved in December 2020 for RentSafeTO, this must be part of a larger effort to protect affordable housing, one that includes the meaningful engagement with tenants directly affected by inadequate housing.

Thank you,

Centre for Equality Rights in Accommodation.

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

² Social Planning Toronto. *Spaces and Places of Exclusion: Mapping Rental Housing Disparities in Toronto's Racialized and Immigrant Communities*. November 2020.
https://d3n8a8pro7vhmx.cloudfront.net/socialplanningtoronto/pages/2414/attachments/original/1605553111/Exclusion_report_FINAL_for_web.pdf?1605553111

³ Ibid.

⁴ Supra Note 1.