

November 12, 2024

Dear Mayor Chow and Members of Council,

Re: PH16.4 - Implementing a Rental Renovation Licence By-law to Address Renovictions

Social Planning Toronto would like to offer its support and recommendations for the Renovictions Bylaw. We are a non-profit, charitable organization that challenges inequity in our city — through knowledge generation, debate, civic engagement, advocacy, and collaboration — to spark social and policy change.

Our organization has supported and organized with various tenant groups across the city who experience housing precarity, specifically in the inner-suburbs where there is a high concentration of racialized and newcomer populations in neighbourhoods such as ThorncliffePark, Flemingdon Park, and Jane-Finch living in privately-owned rental towers. Their experiences with eviction reflect what Statistics Canada found, which is that half of evictions nation-wide are due to landlord factors, which include sale of property, own use, and repairs and renovations.

As Toronto's housing crisis worsens at a rapid pace, Social Planning Toronto is pleased to see this Renovictions Bylaw come forward; this is a crucial time where municipalities need to exercise as much power as possible to prevent tenant displacement. This is a precedent-setting bylaw for municipalities, and we only wish for it to succeed. We hope the new regulations included as part of the Renovictions Bylaw will deter financialized landlords as well as smaller landlords from enacting bad-faith evictions.

Unfortunately due to vacancy decontrol and lack of Provincial laws to protect renters, renovictions have become an easy way for landlords to evict tenants and make profit. In fact, a 2023 report by RenovictionsTO (Weber & Zigman) provides several examples of how for financialized landlords, renovictions have been central to their business model. As tenant advocates and people with lived experience of housing precarity have highlighted, many renovictions are done in bad faith and do not require tenants to actually leave the unit to undergo renovations. Moreover, under the guise of 'needing to do repairs', landlords have been able to raise rents on tenants above-the-guideline much too easily.

We encourage the City to continue monitoring and improving this bylaw on a regular basis, learning from other jurisdictions in Canada with similar bylaws such as Hamilton, New Westminster, and Ladysmith. The fact that Provincial law is failing to deter renovictions can only mean landlords will find other ways to evict tenants. We would urge the City to work in partnership with the Province to explore solutions to stop landlords who attempt to use extra-legal tactics to enact renovictions (that is, without issuing N13s).

The Rental Renovation License will cost a landlord \$700 per rental unit, which we believe is a good starting point to prevent landlords from enacting renovictions. However, corporate landlords who may be more financially-equipped may continue to conduct extensive renovations through legal means; considerations need to be made to increase this fee for larger landlords if data collected from the City reveals this is necessary.

We would like to see the City engage in a city-wide outreach and education strategy in partnership with community-based organizations to inform tenants of their rights well-before renovation notices are issued. For tenants who receive N13s, it's imperative that tools, guides, resources outlining tenant rights be translated in as many languages as possible (and offer free phone or in-person translation services as needed).

Specialized services must be offered to vulnerable groups, such as people facing gender-based violence, who may need more options for housing and additional wrap-around services. This includes prioritizing people with disabilities who are overrepresented among evicted tenants in Canada. Furthermore, the renovictions bylaw must adopt a human-rights, intersectional, trauma-informed lens, especially when assessing individual cases of renovation. For marginalized communities who have limited housing options, renovictions can put them at serious risk and compromise their health, safety and well-being.

Tenant compensation packages should offer enough funds to reflect the realities of current asking rents in the preferred location they wish to move to, similar to updated rental replacement policies for tenants experiencing relocation due to demolition.

We are pleased to see efforts to establish a Rental Registry and hope that this database will integrate centralized data across all of the City's affordable housing programs - RentSafe TO, Tenant Support Program, Eviction Prevention in Community. We recommend the City employ enough staff to be able to effectively track and monitor relevant pieces of data, especially in regards to tenant displacement.

A broader City effort could be made to to integrate Landlord Licensing programs like RentSafeTO and the Multi-Tenant Homes Framework, so that data is centralized and policies, are applied in a consistent way.

As the Multi-Tenant Homes Framework aims to protect some of our most deeply affordable housing stock on the private market, we support an iterative process to assess the effectiveness of the Renovictions Bylaw for multi-tenant homes that are in the process of obtaining a license. In this case, the priority should always be to keep the tenant in their home for as long as possible, so long as it is safe to do so.

Ultimately, it is still early to understand how the Renovictions Bylaw will positively impact tenants, but we believe this is a step in the right direction for the City of Toronto. Moving forward, resourcing this program with sufficient staff, data infrastructure, monitoring efforts and tenant support programs will be incredibly important.

Thank you,

Melissa Wong
Director, Engagement & Strategic Initiatives

On behalf of Social Planning Toronto