



April 4th, 2024

Re: PH11.8 - RentSafeTO Program Update Report

The Federation of Metro Tenants Associations is a 50 year old non-profit in the City of Toronto that advocates for tenant rights and provides services for tenants.

We're writing today to offer our support for the latest changes recommended to improve the RentsafeTo program.

FMTA, and several other allied agencies, have been working on the issue of repair enforcement programs with the City since at least 2005. We are working towards a legal enforcement system where tenants get 100% of the maintenance they are due in exchange for the rent they pay.

Currently many tenants do not get what they pay for in terms of maintenance and often have to struggle immensely just to get the landlord to follow very basic elements of the law. The main aim of our work with the RentsafeTO program is to help tenants get the dignity and living conditions that they deserve, are legally entitled to and that they pay for.

What we like

We feel there are a number of positives in this report:

- The timeline for building evaluations decreased from every three years to two years
- All information required to be posted on the notification board shall be posted in a manner that ensures each piece of information is completely visible to tenants.
- Redesign of the evaluation tool to include in-suite violations and orders to comply in the building score
- Targeted engagement initiative to address and monitor ongoing maintenance concerns in between building evaluations
- Attempts to investigate or regulate eviction fraud, which is currently rampant in the City
- A recommitment to direct door-to-door engagement regarding tenant rights and responsibilities

These are excellent recommendations that look to increase repair enforcement, ensure accurate information, improve tenant education and tackle issues of rampant fraud in the rental market.

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What We'd Like to See in the Future

On the other hand, we did want to take some time to outline ongoing concerns with the RentsafeTO program and other elements we feel need to be addressed as the program moves forward.

Recommendations:

- Better enforcement through higher fines and penalties for landlords who do not comply with notices and orders. We hope to see the introduction of Administrative Penalties as soon as possible. Evaluating buildings and changing the Building Evaluation Tool will not be effective without enhanced enforcement.
- Building audits triggered by an increase in service requests through 311. We need more details on how the targeted engagement initiative will work.
- Including tenants in building evaluations – tenant voices matter and the issues we face may not be captured through inspections with the landlord alone.
- Ensure proper follow up with tenants that submit service requests. Staff should not close a file just because a landlord says they have resolved the issue. Staff should confirm with the tenant that the issue is resolved.
- We need RentSafeTO information in more languages. Tenants whose first language is not English may not understand the program or that it exists.
- Provincial Orders (Fire, ESA) should also be listed on notice boards.
- Tenants should receive landlord plans (capital, repair, vital service, pest control, service disruption) immediately, not after 60 days.
- Remedial action needs to be undertaken by the City in more situations where the landlord neglects maintenance and repairs.

Other concerns:

- **Registration.** We continue to have concerns that thousands of buildings which should be part of the RentsafeTO program have not been registered. The writer of this deputation lives in a 3 story, 10 unit rental building which has never been registered with RentsafeTO.
- **Ticketing.** In our consultations with staff during the development of the RentsafeTO, increased ticketing enforcement was presented as the main element of the new program. However, every time information on currenting ticketing practices is sought, MLS never provides anything and the use of increased ticketing appears as if it has never been attempted.
- **Transparency.** We continue to have concerns about transparency throughout the program. Tenants continue to ask that the name of their landlord/owner be listed,

however this info is sometimes not provided at all or sometimes only a property manager is listed.

- **Accountability.** We continue to have concerns about accountability for the program. In many cases, things we've been told previously by MLS have later been determined to be untrue, changed, different, etc. We no longer trust the information we get from MLS and now have to rely on others to fact check the info to assure it's true.
- **Appeals.** Part of the issue with Chapter 629 property standards enforcement relates to the appeals process, often set out by the province. The creation of Chapter 354 was supposed to create not only a basket of new ticketing offenses, but also a new appeals process. We look to see improvement there.
- **Inspections/Evaluations:** It is our understanding that immediately after the passing of Chapter 354, MLS undertook evaluations of buildings. It is also our understanding that they never inspected any of the new elements required under the new bylaw. It is unclear if the new requirements have ever been enforced...we'd like them to become part of the evaluation process.

We're appreciative of the City moving forward on the implementation of this program and we hope we'll be able to help with our stated goal of improving living conditions for tenants in the City of Toronto.

Sincerely,



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