



Wednesday, June 12, 2024

Sent via Email: phc@toronto.ca

Planning and Housing Committee
City Hall
100 Queen St. W.
Toronto, ON M5H 2N2

Dear Planning and Housing Committee,

RE: Support for A By-law Mirroring The Hamilton Anti-Renovictions By-law

I am writing to express the Advocacy Centre for Tenants Ontario's (ACTO) strong support for a by-law at the City of Toronto that mirrors the anti-renoviction by-law approved by the City of Hamilton. Toronto's proposed by-law is essential for ensuring Toronto meets its goals for fair, accessible, and affordable housing.

We support the following principles with respect to this bylaw discussion:

Avoiding Excess Consultations To Improve Report: We want to set out that consultation for this by-law has been ongoing for at least the last five years. If further consultation is required, it should be on how to implement the by-law and not what elements need to be included.

Rehousing and Rental Assistance: The key legislative pieces within the Hamilton anti-renovictions by-law that will reduce the amount of renovictions obligate landlords to rehouse tenants and to provide rental assistance. This was a proven deterrent in New Westminster, British Columbia, which solved its renoviction problem with this kind of approach. With renovictions reduced, the city's financial estimates on running the program will similarly be reduced.

Including Small Buildings and Houses: Renovictions are popular among smaller buildings, especially those not subject to the RentSafeTO program. A new by-law covering renovictions must be universal for rental units not and shield smaller buildings and homes from the legislation.

Registration vs. Licensing: A licensing system is favoured over a registration system because it is a better form of checks-and-balances.

Expedite the Implementation of the By-law: City should seek a window between approval and implementation that is equal-to-or-better than Hamilton's nine month period, as opposed to current proposed twelve month period - November 2024 to November 2025. To achieve an anti-renoviction policy as soon as possible, the report

needs to be improved between now and City Council on June 26 to allow the City to implement a Hamilton style by-law.

While Ontario's Bill 97 includes tenant protections for bad faith evictions, an anti-renovictions by-law in Toronto is necessary because the bill is simply not effective in addressing renovictions. The status quo relies on complainants putting forth their issue to the Landlord and Tenant Board which has failed to deliver justice for tenants who have to wait for up to 2 years for a resolution of their tenant's rights application. Furthermore, from 2020 to 2023, only 4 out of 13 landlords who were ordered to pay fines for evicting tenants for "bad faith evictions", like renovictions, actually paid those fines. Moreover, when and if bad actors are identified, the fines issued are an insufficient deterrence because they never approach the maximum fine allowable. In conclusion that is why tenants need an effective municipal anti-renoviction bylaw that addresses the shortcomings that exists in Bill 97.

An anti-renoviction bylaw expands on Toronto's existing policies that protect vulnerable residents. The city already acts effectively when it comes to re-housing TCHC tenants when their homes and complexes are renovated or re-designed. The bylaw builds upon the city's existing rental housing demolition and conversion rules which preserves affordable housing when owners are applying to convert or demolish purpose built rentals. A proposed anti-renoviction by-law is within the city's jurisdiction to enact and it is completely in keeping with what Toronto tries to do for all its tenant communities under the gun of redevelopment, renovation, and demolition.

Hamilton's anti-renovictions by-law, itself influenced by a widely successful anti-renovictions by-law from New Westminster, British Columbia, is an essential model for ending the outsized role that renovictions play in Toronto's broader housing crisis. It is essential because it both eliminates renovation scams from dishonest landlords that evict tenants into Toronto's housing crisis while allowing honest landlords to carry out improvements on their property. By taking meaningful action on renovictions that mirrors Hamilton's, Council can help prevent both the further loss of Toronto's affordable housing stock and having more families uprooted from their homes and communities and into Toronto's ever-increasing housing crisis. This by-law is exceptionally urgent and Council cannot afford to miss this opportunity to protect the City's housing supply and the overall well-being of its residents.

ACTO stands firmly in support of adopting an anti-renovictions by-law in Toronto that mirror's Hamilton's as soon as possible, and we hope that you will consider its adoptions as an important step towards ensuring affordable and accessible housing for all residents of Toronto.

We look forward to a constructive discussion on this proposed by-law.

Yours very truly,

Advocacy Centre for Tenants Ontario

per:



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