

# Renovictions Policy Implementation

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Submission to Planning and Housing Committee

June 13, 2024

Submission by: Right to Housing Toronto



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Councillor Gord Perks  
Chair of the Planning and Housing Committee  
Toronto City Hall  
100 Queen Street West  
Toronto, ON M5H 2N2

Dear Members of the Planning and Housing Committee,

**Re: PH13.7 - Renovictions Policy Implementation: Review of Hamilton Renovation Licence and Tenant Relocation By-law and developing a Toronto Renovictions By-law**

We are representatives of the Right to Housing Toronto (R2HTO), a network of organizations and individuals working to support the implementation of the right to housing by the City of Toronto. We are writing in response to item [PH13.7](#) regarding the implementation of the city's Renovictions Policy, which has the potential to help preserve Toronto's dwindling stock of affordable housing and ensure renters can live in safe, secure, and affordable homes.

We are pleased that the city is moving forward with the implementation of its Renovictions Policy, including by considering the Hamilton Renovation License and Tenant Relocation By-law in the development of a Toronto Renovictions By-law. We strongly support the development of a Hamilton-style Renovictions By-law for Toronto and urge the city to take immediate action on its implementation to protect renters and the city's stock of affordable housing.

In particular, we support considerations for tenant accommodation or compensation plans, as well as a tenant notification requirement, which would include information about renter rights and available supports. This would align with the city's Rental Replacement Policy and ensure that renters are well supported in the event of a renovation requiring vacant possession of their unit. As noted in the staff report, this would also help protect against the erosion of Toronto's affordable rental housing stock by ensuring renters are able to return to their unit at the same rental rate, while also discouraging the practice of bad faith renovictions that take advantage of the vacancy decontrol provision in Ontario's Residential Tenancies Act. To guard against renter displacement and uphold the right to housing, we strongly encourage the city to include tenant accommodation and compensation requirements in its Renovictions By-law, mirroring those in its Rental Replacement Policy.

We also support the consideration of licensing or registration requirements for landlords seeking vacant possession of a unit to undertake renovations. Requiring landlords to obtain a renovation license from the city is a critical accountability element of the Hamilton By-law, which will help ensure renovations are being undertaken in good faith. Moreover, a public registry related to



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renovation activities would align with a rights-based approach to implementing Toronto's Renovictions Policy by providing transparent, accessible information to support renter decision-making and advocacy efforts. We strongly encourage the city to replicate Hamilton's requirements for landlords to obtain a renovation license, while exploring opportunities to develop a public registry.

Despite these important considerations, we are concerned with the proposed timeline for the development and implementation of the Renovictions By-law, including the targeted launch of November 1, 2025. Renovictions have [increased dramatically](#) across Ontario, with the highest number of N13 notices filed in Toronto. At the same time, [research](#) has demonstrated that evictions disproportionately impact Black and other racialized communities in Toronto. From an equity and human rights perspective, it is incumbent on the city to take urgent action to develop and implement a Renovictions By-law that will protect renters and the city's affordable housing stock, using the Hamilton by-law as a clear and actionable model. This should include appropriate accountability mechanisms to monitor, evaluate, and report on the effectiveness of the by-law, as well as ensure its enforcement.

While we strongly support meaningful community consultation and engagement as part of a rights-based approach (especially with people with lived experience of renovictions), we encourage the city to focus the consultations on how to implement the Hamilton model in Toronto, rather than on determining the scope or design of a new by-law, considering significant consultation has already been done to this point.

Finally, we urge the city to apply the Renovictions By-law to all rental units, including multi-tenant houses (MTH). While we recognize and understand the need to balance the Renovictions By-law with the new MTH framework, which is focused on bringing MTHs into a state of good repair, we recommend that in the long-term, the Renovictions By-law include MTHs. We remain concerned about the potential displacement of MTH renters under the city's new framework and urge the city to ensure that MTH renters, who are among the most marginalized community members in the city, are protected from displacement, while also protecting some of the most affordable homes in the city.

Thank you,  
On behalf of Right to Housing Toronto (R2HTO)



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