



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

October 29th, 2024

RE: PH16.4 - Implementing a Rental Renovation Licence Bylaw to Address Renovictions

Dear Members of the Planning and Housing Committee,

We are writing on behalf of WomanACT, a charitable organization working collaboratively with the anti-violence sector, governments, private sector, and community members to eradicate gender-based violence and advancing gender equity by mobilizing research, policy, and education, and 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 [PH16.4](#), which, if adopted, would be an important step forward to help preserve Toronto's dwindling stock of affordable housing and ensure renters can live in safe, secure, and affordable homes.

In alignment with the City's [HousingTO Action Plan](#), [SafeTO plan](#), and commitment to advance the right to housing, it is essential that the development and implementation of the Renovictions Bylaw adopts a human rights, gendered, and trauma-informed lens to prevent and improve responses to Gender-Based Violence (GBV), including family and intimate partner violence, and address the unique needs of survivors, in addition to the broader needs of tenants facing displacement. We are encouraged by the City's acknowledgement of renovictions as a serious issue and the development of a proposed bylaw and implementation framework that would help uphold the right to housing for tenants, especially for survivors of GBV from low-income and marginalized communities.

There is strong [evidence](#) demonstrating the connection between violence, gender, housing insecurity, and homelessness. GBV is a significant factor contributing to [housing instability](#) and homelessness for women and gender-diverse individuals. Women experiencing Intimate Partner Violence (IPV) often report experiencing discrimination from landlords in the form of denial of applications or evictions. According to WomanACT's Successful Tenancies research with survivors in Toronto's rental market (2023), of the 141 survivors surveyed, 37 percent experienced GBV in their residences, and 38 percent reported feeling unsafe or at risk of such violence. Survivors shared experiences of having to vacate their rental units (17 percent), facing eviction (10 percent), or dealing with property damage (19 percent) (WomanACT, 2023). In the current context, renovictions further contribute to survivors' housing instability by displacing them without providing adequate accommodation or compensation, increasing risks for further violence and victimization.



As such, we are glad to see a strong focus in the proposed bylaw and implementation framework on accommodation, compensation, information, and education for tenants, as well as resources to support monitoring, evaluation, and accountability processes. This reflects much of the feedback that [R2HTO](#) and many others shared throughout the City's consultation processes. In particular, we strongly support landlord requirements around accommodation and compensation for tenants who exercise their right of first refusal and those who choose not to return to the unit (including for moving costs). It is encouraging to see the proposal align with the City's rental replacement policies related to rent gap assistance that more closely reflect the current cost of renting.

We also support the various methods and strategies proposed to inform tenants of their legal rights, the parameters of the bylaw, opportunities to seek support, and the status of renovation activities in their buildings, including by the City and landlords alike. Similarly, we are glad to see efforts proposed to develop and share guidance materials with landlords to inform them of their responsibilities and obligations, alongside significant penalties for non-compliance.

In addition, we support the inclusion of multi-tenant homes (MTH) under the proposed bylaw, recognizing that MTH tenants are some of the city's most marginalized communities and the most vulnerable to displacement. As part of implementing the MTH framework, it will be critical to ensure adequate safety considerations for women, including those experiencing GBV.

We strongly encourage the Committee to adopt item PH16.4 and ensure that it moves ahead swiftly. To strengthen the proposed bylaw and implementation framework, especially for survivors of GBV, we recommend the following additions:

- To ensure landlords' awareness and understanding of Gender Based Violence (GBV), as well as the resources and supports available for survivors, the City should facilitate collaborative capacity building between the anti-violence sector, landlords/building managers, and the Landlord Tenant Board. These efforts should include guidance on responding to disclosures of family and intimate partner violence in accordance with the [Residential Tenancies Act](#).
- To ensure a rights-based approach, Tenant Accommodation or Compensation Plans should include provisions that recognize different tenant needs based on neighbourhood services/amenities (e.g., childcare, schools, healthcare, employment, etc.), family size/status, accessibility, and cultural adequacy. Crucially, these plans should be developed with consideration for the specific safety needs that a survivor of GBV, family, or intimate partner violence may face from a renovation.
- For tenants that exercise their first right of refusal, Tenant Accommodation or Compensation Plans should clearly outline the conditions for the tenant's return to the unit, including rental rates and increases, occupancy of the same unit, access to amenities, and any necessary safety measures.



- Recognizing the need to address emergency health and safety issues in a timely manner, the City should ensure that tenants who are displaced due to emergency repairs or renovations have access to adequate supports.
- To avoid landlord attempts to bypass the licensing system, the City should explore opportunities to tie the building permit application process to the licensing system. The City could also advocate to the provincial government to coordinate this process with the issuance of N13 notices by the Landlord and Tenant Board for a fulsome, integrated monitoring and accountability framework.
- Above and beyond renovictions, the City should also explore opportunities to address and prevent other types of formal and informal evictions that tenants are facing across the city, which could include developing and implementing a comprehensive rental housing licensing program similar to what some municipalities in British Columbia have adopted (e.g., New Westminster, Ladysmith).

The Renovictions Bylaw is a critical opportunity for the City to address the needs of tenants facing soaring rent costs, low vacancy rates, few affordable options, and increasing housing precarity while reaffirming its commitment to supporting women and children fleeing violence. We applaud your shared commitment to this vision for our city and our community, and we welcome an opportunity to discuss our recommendations further.

Sincerely,

Harry Mendoza
Executive Director
WomanACT



On behalf of Right to Housing Toronto (R2HTO)
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