



REPORT FOR INFORMATION WITH CONFIDENTIAL ATTACHMENT

Bill 60, Fighting Delays, Building Faster Act, 2025, and Renter Protections - Legal Advice

Date: December 8, 2025

To: City Council

From: City Solicitor

Wards: All

REASON FOR CONFIDENTIAL INFORMATION

The attachment to this report contains advice or communications that are subject to solicitor-client privilege

SUMMARY

At its meeting on November 12 & 13, 2025, City Council adopted [Item EX27.1](#) - Impacts of Provincial Legislation that Weakens Rental Protections, with amendments, requesting, amongst other things, that the City Solicitor review legal options to protect renters and challenge provisions of Bill 60, including potential Charter challenges. This report responds to that direction.

RECOMMENDATIONS

The City Solicitor recommends that:

1. City Council receive this report for information.
2. City Council direct that the confidential information contained in Confidential Attachment 1 remain confidential in its entirety, as it contains advice which is subject to solicitor-client privilege.

FINANCIAL IMPACT

There is no financial impact arising from these recommendations.

DECISION HISTORY

At its meeting on November 12 & 13, 2025, City Council adopted [Item EX27.1](#) - Impacts of Provincial Legislation that Weakens Rental Protections, with amendments, requesting, amongst other things, that the City Solicitor review legal options to protect renters and challenge provisions of Bill 60, including potential Charter challenges.

COMMENTS

On November 24, 2025, the Government of Ontario adopted Bill 60: Fighting Delays, Building Faster Act, 2025 ("Bill 60"). Bill 60 includes 16 schedules, through which it amends numerous pieces of legislation, focussing on housing, infrastructure, and development. Some of the legislation impacted includes the Residential Tenancies Act, the Development Charges Act, the Planning Act, the Highway Traffic Act, the GO Transit Station Funding Act, the Toronto Waterfront Revitalization Corporation Act, and the Transit-Oriented Communities Act.

This report is focussed on the Bill 60 amendments to the Residential Tenancies Act ("RTA") and its potential implications for renters in Toronto. Schedule 12 of Bill 60 contains numerous amendments to the RTA, which will come into force on a day to be named by order of the Lieutenant Governor in Council.

The amendments are summarized below.

1. Changes to compensation requirements for landlord's own-use evictions

Under the RTA, a landlord can issue a notice of eviction (N12) if they, in good faith, require possession of the rental unit so that the landlord, a specified family member or a caregiver can move into the unit for a period of at least one year. The landlord must provide the tenant with at least 60 days' notice of the eviction. Prior to the amendments, in addition to 60 days' notice, the landlord had to provide the tenant an amount equal to one month's rent or offer the tenant another rental unit acceptable to them. With the recently adopted amendments, now if a landlord gives a tenant at least 120 days' notice, as opposed to the required 60 days for this type of eviction, the landlord does not have to give any compensation to the tenant. Compensation is still required if less than 120 days' notice is provided.

2. Reducing the amount of time before a rental arrears eviction notice is effective

Under the RTA, when a tenant does not pay their rent on time, the landlord can issue a notice of eviction (N4) on the day after the rent is due. Prior to the Bill 60 amendments, for fixed term or monthly tenancies, the termination date on the notice had to be at least 14 days after the date the notice was given to the tenant. With the amendments, the termination date on the notice has been reduced to a minimum of 7 days.

If the tenant fails to pay the rent before the termination date, the landlord can file an application (L1) with the Landlord and Tenant Board (LTB) on the day after the termination date.

3. Two amendments with respect to a tenant's ability to raise their own issues at a hearing: (1) Requires a tenant to pay 50 percent of the rent arrears that a landlord claims they are owed before raising their own issues; (2) Removes the LTB's discretion to grant a tenant relief from a requirement to provide notice of these issues in advance.

Under the RTA, when a tenant does not pay their rent on time, the landlord can issue a notice of eviction on the day after the rent is due. If the tenant fails to pay the rent by the termination date in the notice, the landlord can file an application (L1) with the LTB on the day after the termination date seeking eviction. Alternatively, a landlord can file an application (L9) at the LTB to collect rent a tenant owes, without seeking eviction.

When a landlord files an L1 or L9 application with the LTB, the RTA allows the tenant to raise certain issues as part of a counterclaim. The tenant is permitted to raise any issue that could have been the subject of a tenant's application to the LTB, which include disruption to vital services, maintenance and repair problems, illegal charges or deposits, rent rebates, changed locks without giving replacement keys, entered the unit illegally, harassment, and/or interference with reasonable enjoyment.

To raise these issues at an LTB hearing, the tenant had to give advance written notice to the landlord of the tenant's intent to raise the issue at the hearing within the time set out in the LTB's Rules; or the tenant could provide an explanation satisfactory to the LTB explaining why the tenant could not comply with the above requirements. If these conditions were met, the LTB was required to hear the issues at the arrears hearing.

Bill 60 amended the RTA to remove the discretion of the LTB to grant a tenant relief from the notice requirement. It also added a requirement for a tenant to pay 50% of the arrears the landlord has claimed are owing in the LTB application to the landlord before they may raise their own issues at the arrears hearing.

4. Reducing the amount of time a renter can request a review (appeal) of a decision of the LTB from 30 days to 15 days

Under the RTA and LTB Rules of Procedure, the LTB has the discretion to review a final order where the order contains a serious error, or a party was not reasonably able to participate in the proceeding. Prior to the Bill 60 amendments, a party's request to review an order or amended order had to be made within 30 days of the order being issued. Bill 60 reduces this appeal period to 15 days.

5. Additional Amendments

Currently under the RTA, a landlord may give notice of termination of a lease at the end of the term for several limited reasons, one being that the tenant has persistently failed to pay rent on time. Bill 60 allows the Government of Ontario to define "persistent failure" by way of regulation, which has not been published.

Additional Bill 60 amendments that will be implemented via future regulations will allow the Province to prescribe the rules and guidelines that the LTB must apply and the circumstances it must consider when making its decisions and orders, postponing an eviction order, and reviewing an order.

By way of background, prior to first reading, as part of the original Bill 60 announcement, the Government of Ontario was considering consulting on alternative options to allow for lease agreements to expire and landlords to control who occupies their units and for how long, which would erode the security of tenure renters in Ontario currently benefit from. As of November 1, 2025, the Government of Ontario announced that it was no longer moving forward with that consultation. The RTA currently provides security of tenure – renters have a right to remain in their rental unit as long as they follow the lease agreement and the RTA, with some very limited exceptions that are specified in the RTA. Nothing in the adopted Bill 60 impacts security of tenure; it only contains the amendments summarized above.

The confidential attachment provides legal advice regarding the amendments.

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SIGNATURE

Wendy Walberg
City Solicitor

ATTACHMENTS

Confidential Attachment 1 - Confidential Information