

States should adopt legislation or other measures to ensure that private actors—e.g., landlords, property developers, landowners and corporations—comply with human rights standards related to the right to adequate housing.

The use of non-market solutions to the housing crisis is not addressed as often as it should be so it is gratifying to see rent geared to income housing as a recommendation in this report. As of this writing, average market rent for a new unit in Toronto is \$2,300 a month. With Ontario's definition of affordable housing set at 80% of market rate, affordable rents can be as high as \$1,840, well out of reach for anyone on a standard pension or disability. So long as the units are well maintained, providing RGI units to seniors offers them a measure of stability that market housing does not.

However, allowing seniors to age in place means keeping them in place and this can be more difficult than expected. A 2022 report from the Canadian Mortgage and Housing Corporation (2) studied senior evictions on a national level and found that no-fault evictions (particularly reno- and demovictions) are commonly used to displace senior tenants. This allows landlords to remove long-time tenants and raise the rent of those units to current market rate, often triple the amount. And this happens even with standard eviction protection, as the CMHC's report states:

Professional and lived experience interviewees also cited specific landlord practices as drivers of eviction for older tenants. Examples provided in these interviews included: shutting off utilities and appliances, forms of bullying and harassment, surveillance and intimidation, suggesting that the building had been sold and tenants had to move out (without an actual sale taking place), locking tenants' access to their mailboxes (so they can't access rent notices), and financial compensation to relocate (known as a 'cash for keys' eviction). While these practices take place 'outside' official eviction processes, they were identified in interviews with professionals and older tenants as attempts at informal eviction.

The CMHC goes on to detail the physical, mental, social, and economic ills that come from even the threat of eviction. Senior tenants are disproportionately targeted for their units and often suffer repeated attempts to displace them, each one bringing its own health impacts and further necessitating the need for supportive services. When considering the application of NORCs in the context of Toronto's housing market, seniors require additional protections against landlord abuses to maintain their quality of life.

Analysis

It is not an easy time to be a tenant in Toronto, especially on a fixed income. Many senior tenants face eviction or suffer through inhumane health and safety standards to keep their low rent. By expanding RGI options for seniors and integrating that approach into a Seniors Strategy and the city's Official Plan, Toronto can offset the worst effects of the housing market on a particularly vulnerable group.

The report describes the development of new RGI buildings for seniors yet there are already NORCs that have developed in market housing with seniors hoping to age in place where they are. These NORCs usually include many of the necessary resources seniors need to thrive, which include access to public transit, affordable and healthy food sources, and are spaces where seniors are already integrated into the fabric of their communities. In addition, there is an existing glut of unused housing in Toronto due to the crashing condo market. As such, converting and integrating RGI units in existing market-rate housing will provide immediate relief and protections for seniors, helping keep them within their existing communities. One possible solution is to work with the city's Multi-Unit Residential Acquisition (MURA) program to obtain potential properties to convert to RGI units, although more funding would be required.

Delivering supportive services to seniors may become a Sisyphean task if those seniors are displaced out of their neighborhood or out of the city entirely. Senior tenants have local connections to healthcare and community services, many are reliant on their proximity to these services to get by, but with redevelopment as the primary force in housing, tenants can be displaced from their home for years at a time. Although most seniors are offered an opportunity to return after a redevelopment, the loss of finances and support cannot be recovered and what was supposed to be a temporary move becomes permanent. Whether they are able to access the same services in their new area is unknown, so the cascading effects on a senior tenant can be devastating. Guarding seniors against evictions not only protects them from innumerable health issues and financial stress, it ensures they remain in the NORC where they are able to benefit from the increased services delivery.

Conclusion

As frontline service providers to senior tenants in Toronto, the FMTA supports the initial framework offered in this report and would like to see a formalized definition of NORCs forthcoming as part of a third Seniors Strategy. With the proper protections and service options embedded in them, NORC's would be a major step forward in offering seniors in Toronto the peace of mind they deserve.

References

(1): Office of the United Nations High Commissioner for Human Rights (2014). The Right to Adequate Housing. Geneva: United Nations
https://www.ohchr.org/sites/default/files/Documents/Publications/FS21_rev_1_Housing_en.pdf

(2): Zell, S., and McCullough, S. (2021). Seniors and Evictions in Canada: A Life-Course Approach. Ottawa: Canada Mortgage and Housing Corporation.
https://eppdscrmssa01.blob.core.windows.net/cmhcprodcontainer/sf/project/archive/research_6/seniors-eviction-report---final.pdf

Federation of Metro Tenants' Associations

(416) 646-1772
PO Box 73102 Wood St.
Toronto, ON, M4Y 2W5
fmta@torontotenants.org
www.torontotenants.org