

Implementation of Recommendations on the City's Response to a Vital Services Outage in a Multi- Tenant Home

Submission to the Executive Committee

December 8, 2025

Submission by: Right to Housing Toronto



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Mayor Olivia Chow
Chair of the Executive Committee
Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Dear Members of the Executive Committee,

Re: EX28.2 - Status Update: Implementation of Ombudsman's Recommendations and Council Directives on the City's Response to a Vital Services Outage in a Multi-Tenant Home

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 [EX28.2 - Status Update: Implementation of Ombudsman's Recommendations and Council Directives on the City's Response to a Vital Services Outage in a Multi-Tenant Home](#).

Current context

Toronto is in the midst of an escalating housing and homelessness crisis, characterized by rising rents, increasing evictions, diminishing affordable options, and limited renter protections (which will be [further accelerated](#) following the passage of the provincial *Fighting Delays, Building Faster Act, 2025*). Multi-tenant houses (MTHs) are a vital element of affordable housing infrastructure and provide homes to some of the most vulnerable members of our communities, including refugees, newcomers, social assistance recipients, students, and other low-income and marginalized groups.

As part of its commitment to progressively realize the right to housing (as outlined in the [Toronto Housing Charter](#) and [HousingTO 2020-2030 Action Plan](#)), the City must ensure that MTH renters have safe, secure, and affordable homes. In the absence of sufficient affordable housing in the private rental market and community housing sector, there are increasingly few options available to displaced MTH renters, who are often very low-income and face other intersecting socioeconomic barriers. As a result, if an MTH renter loses their home, it is likely that they may experience homelessness. While homelessness is above all a moral, systems failure, it also puts undue pressure on costly public services, many of which are borne out at the municipal level (including shelters, policing, public health, and other social services).



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The City's [Multi-Tenant Houses Framework](#) is an important step toward protecting affordable housing across Toronto. The framework aims to protect the health and safety of MTH renters through consistent standards and requirements for MTH operators. Ensuring that MTH renters have ongoing access to safe and well-maintained housing is a critical way for the City to uphold its commitment to the right to housing.

Notwithstanding the ongoing challenges related to the recent [fire](#) at two Toronto apartment buildings in Thorncliffe Park, it was encouraging to see the City's swift response and ongoing community support provided to the displaced residents. To ensure equitable and human rights-based outcomes, it is critical for the City to dedicate the same level of support and attention to any residents displaced by such a severe health and safety threat, regardless of whether they live in a condo or a multi-tenant home.

Progress on the Ombudsman's recommendations and Council directives

As we noted in our previous [submission](#) on Ombudsman Toronto's investigation into the City's response to a MTH vital services outage, R2HTO strongly supported the Ombudsman's recommendations for the City to improve its policies and procedures, service standards, staff training and supervision, and response to vital services outages.

We commend the City for its important progress in implementing the Ombudsman's recommendations and related Council directives. As outlined in the [status update report](#), it is promising to see close collaboration between City staff and the Ombudsman's Office, alongside stronger enforcement processes, staff training improvements, and work underway to strengthen interdivisional coordination to better protect renters affected by vital services disruptions.

In particular, we are glad to see new protocols in place that enable MTH renters who are displaced due to a vital services outage to access support through the City's Emergency Social Services (ESS) program, including temporary accommodation and other basic needs. We look forward to forthcoming updates to the Eviction Prevention in the Community (EPIC) program, including improving program criteria and clarifying the protocol to provide housing supports to displaced MTH renters through ESS.

It is also encouraging to see the City take steps to develop "housing as a human right" training for all housing-related staff, including those involved in the implementation of the MTH framework. This responds to long-standing advocacy from R2HTO and other advocates across the city, and we look forward to supporting this critical work. It is promising to see that Municipal Licensing and Standards (MLS) staff participated in initial training with the Ombudsman's Office,



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and we look forward to hearing more about the outcomes of their standard operating procedures review through a right to housing lens.

Ongoing MTH renter displacement and affordable housing loss

While we welcome the City's progress to improve its response to MTH vital services outages and protect MTH renters, we are concerned about the narrow scope of these changes in the context of the broader implementation of the MTH framework. As we noted in our recent [submission](#) to the Planning and Housing Committee and previous [advocacy](#), the City's current approach to implementing the MTH framework may unintentionally lead to MTH renter displacement and affordable housing loss for several reasons beyond a vital services outage, including:

- Zoning restrictions (e.g., the six-room limit for MTHs in many areas of the city).
- MTH operator sales or conversions.
- Ongoing unlicensed MTH operations (highlighted as a key challenge in the [MTH implementation update report](#)).

Recommendations

To help prevent MTH renter displacement and affordable housing loss, we strongly urge the Committee to bring forward and/or vote in favour of any motions that support the recommendations outlined below, which are based on engagement with MTH advocates across the city:

1. Provide meaningful support for MTH renters

- a. Displacement protection:** The City should develop targeted programs and policies to support all MTH renters facing displacement. This could include emergency and/or portable housing benefits, alternative housing solutions, and/or system navigation.
- b. Outreach and engagement:** The City should increase funding to conduct more proactive outreach to MTH renters and provide ongoing engagement opportunities, including by building on the proposed outreach improvements recommended in the staff report. This could also include expanding access to EPIC and/or the Toronto Tenant Support Program (TTSP) for MTH renters at risk of displacement, establishing an MTH Advisory Group with MTH renter representation and expertise (building on the work of the Housing Rights Advisory Committee outlined in the report and the advisory group [proposed](#) by the Planning and Housing Committee) and/or hosting MTH town halls.



2. Remove restrictive MTH requirements

- a. **Room counts:** The City should increase the limit on the number of allowable MTH rooms in Scarborough, Etobicoke, and North York from six to 12-25 to minimize displacement, ensure city-wide consistency, and maximize access to MTHs across the city.
- b. **Zoning and licensing exemptions:** The City should explore providing zoning and licensing exemptions for City-funded properties and previously licensed private MTH properties that otherwise comply with the framework to encourage operators to continue providing affordable housing, building on the changes [proposed](#) by the Planning and Housing Committee.

3. Increase funding for MTH preservation

- a. **Renovation and repair funding:** The City should increase funding for and improve access to the MTH Renovation Program to help operators come into compliance with the MTH framework, including by building on proposed changes to improve program access recommended in the staff report.
- a. **Acquisition funding:** The City should prioritize and maximize funding for the Multi-Unit Residential Acquisition (MURA) program to preserve affordable rental housing across the city, including MTHs, by supporting community housing providers to acquire affordable rental housing at risk of sale or conversion. The City should also direct federal and provincial funding (e.g., Canada Rental Protection Fund) toward the program.

4. Strengthen MTH monitoring, enforcement, and accountability

- a. **Internal coordination:** The City should coordinate enforcement and implementation of the MTH framework across City divisions to prioritize renter safety and security and affordable housing preservation, including by building on the interdivisional work outlined in the staff report.
- b. **Data collection:** The City should gather data on MTH renter displacement and affordable housing loss across the city, including by building on the proposed data collection changes recommended in the staff report.
- c. **Monitoring and reporting:** The City should regularly monitor and report on the impact of the MTH framework on renter displacement and affordable housing loss, including by building on the proposed monitoring and reporting changes recommended in the staff report.
- d. **Situation Table for Housing-At-Risk expansion:** The City should expand the mandate of the new STAR table to include policy monitoring and development,



with a specific focus on protecting MTH renters and preserving affordable housing.

MTHs are the City's only naturally occurring source of deeply affordable housing. They must be protected, along with the people who live there. In addition to the recommendations above, we encourage the Committee to continue engaging with R2HTO and other MTH advocates in the further development of policies and programs to help protect MTH renters, preserve affordable housing, and uphold the right to housing across Toronto.

Thank you,

On behalf of Right to Housing Toronto (R2HTO)



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