

September 16, 2025

Letter from the Chair, Housing Rights Advisory Committee

In alignment with the City's evolving response to ensure that all people in Toronto, including refugee claimants, are able to access shelter and critical support services, I am pleased to share some updates in support of City Council's direction on [CC28.2](#), in response to the Ombudsman Toronto's Housing Unit's [Investigation into the City's Decision to Stop Allowing Refugee Claimants into Base Shelter System Beds](#).

As part of those directions from Council, I have been working with staff from Toronto Shelter and Support Services to develop and deliver training sessions for senior leaders on the City's Encampment Steering Committee. Further training sessions are being planned and delivered more broadly within Toronto Shelter and Support Services. I am pleased to report that the initial sessions have resulted in engaged and committed discussions on how to operationalize the progressive realization of the right to adequate housing at the City of Toronto.

HRAC will also be consulting with Toronto Shelter and Support Services on its work to develop an Access to Shelter Framework to support analysis of any new shelter eligibility changes in alignment with the Toronto Housing Charter. We will be looking forward to upcoming consultations with their team on this important work.

Regrettably, at the end of August the Federal Government notified the City of Toronto that it would only fund 26% of the costs to shelter refugees and asylum seekers under the federal Interim Housing Assistance Program (IHAP) for the period January 2025 to March 2026. This represents a projected shortfall of \$107 million, resulting in significant operational impacts to the shelter system.

This funding decision by the federal government is contrary to the purposes and requirements set out in the National Housing Strategy Act, which explicitly recognizes Canada's obligations under the International Covenant on Economic Social and Cultural Rights (ICESCR). In so doing, they are jeopardizing the City's ability to comply with its own Charter that was adopted to align with the NHSA in a collaborative spirit. Reducing support for refugee shelter undermines Canada's immediate obligations under ICESCR to ensure access to shelter and housing without discrimination on the grounds of immigration status. The cuts constitute a "retrogressive measure" that cannot be justified in the present context in Canada.

On September 3rd, I attended a roundtable with community organizations working with refugees and asylum seekers in Toronto convened by Mayor Chow and Councilor Bravo to discuss the expected impacts of funding changes through IHAP. The consequences of the funding reduction will mean significantly reduced capacity in the city's refugee serving community and the wider City shelter system, jeopardizing the City's ability to meet its minimum core obligations to protect, respect and fulfill the human right to adequate housing.

The mayor and community organizations are working to convince the federal government to maintain their funding support for refugee shelter in Toronto.

Finally, Annie Hodgins, Chair of the Maintaining Housing Working Group, and I met with staff from Toronto's Municipal Licensing and Standards Division to discuss opportunities to continue to engage with HRAC on the implementation of the Multi-tenant House Licensing By-law (MTH By-law) and in particular, on the tenant protections and the preservation of Multi-Tenant Houses (MTHs). Given that the Committee has identified the implementation of the City's MTH By-law in its Priorities Framework ([HS3.1](#)), I look forward to ongoing opportunities for HRAC to engage on this critical housing rights issue.

Submitted by Elizabeth McIsaac, Committee Chair, September 16, 2025.