

November 19, 2025

Letter from the Chair, Housing Rights Advisory Committee

Since we last met on September 16, 2025, a number of issues that impact the progressive realization of the right to housing at the City of Toronto have emerged at municipal, provincial and federal levels.

City of Toronto

First, and specifically related to a request by this Committee, I received an update from the Executive Director of the Housing Secretariat, regarding a presentation requested by HRAC for today's meeting, concerning the midpoint review of the HousingTO Plan and the City's progressive realization of the right to housing, as outlined in the Toronto Housing Charter. While the Housing Secretariat team began earlier this year to identify uniquely qualified subject matter experts for the task, by the time they were identified there was insufficient time to complete the review by year-end. Given the timing and requirements related to procurement, they are planning to issue an RFP to procure a consultant and complete the review over the course of 2026. They are now working to refine the RFP's scope of work and indicated that they would be pleased to re-engage HRAC in early 2026 once the contract is awarded.

I replied that HRAC would welcome an opportunity to engage in reviewing the scope of work, if helpful, and with the consultant(s) early in their process so that the human rights considerations that the committee has can be incorporated in the design of the review.

Earlier this month the City of Toronto released its [Winter Plan](#), to take effect from November 15, 2025 to April 15, 2026. Last week, HRAC member, Diana Chan McNally, was interviewed on [CBC's Metro Morning](#) on the City's Winter Plan, highlighting the vital importance of ensuring there is an adequate supply of safe, warm, and accessible spaces for all people experiencing homelessness.

On November 14, 2025, City Council passed a [motion](#) to amend to the Interdivisional Protocol on Encampments (IDP). While there was acknowledgement that the current rights-based approach has reduced encampments since 2023, and that there are legal obligations to provide meaningful shelter offers, the Council did vote in favour of changes that effectively suspend human rights for encampment residents within prescribed "bubble zones," including by placing a limit on the number of shelter offers a resident can receive. This step runs counter to the established human rights principles set out in the original IDP and the Toronto Housing Charter and violates the principle of non-retrogression.

Also on November 14, 2025, the City of Toronto submitted a Motion to intervene at the Court of Appeal in Heegsma v City of Hamilton regarding the rights of people living in encampments. In this motion and factum, the City of Toronto argues against courts finding positive obligations on the part of cities to protect the right to life or security of the person of homeless persons under the Charter (s.7). Toronto also argues that imposing a "truly accessible" standard on cities would create a positive duty to provide shelter space that meets the specific needs of an individual, and that this would be prohibitively onerous for a municipality.

I believe it is important for the Housing Rights Advisory Committee to understand Toronto's approach to interpreting the Canadian Charter that is in opposition to its own Toronto Housing Charter and its explicit recognition of the right to adequate housing as a fundamental human right, including the right to accessible housing. It should be in Toronto's interest to have these

obligations on all orders of government clarified rather than undermined, so that a common standard and approach can be adopted and that necessary resources can be identified from appropriate orders of government. To that end I would like to invite the City Solicitor to the next Housing Rights Advisory Committee to explain this approach in the context of the City's commitment to a human rights-based approach to housing.

The province of Ontario

The Ontario government has recently introduced Bill 60 *Fighting Delays, Building Faster Act*, 2025, which includes 13 tenancy-related provisions that undermine tenant protections and rights. If passed, Bill 60 will: eliminate tenant compensation requirements for own-use evictions; reduce the eviction notice period for rental arrears; and significantly diminish renters' ability to advocate for themselves when faced with an eviction. Importantly, an increase in evictions will result in more homelessness. I want to acknowledge the advocacy and coordination across the housing rights sector, and of Mayor Chow and City Council, to oppose these changes and advocate for stronger tenant protections. Last week Council passed the following motion through ([EX27.1](#)):

4. City Council request the Executive Director, Housing Secretariat present to the Housing Rights Advisory Committee on the potential impact of the changes in Bill 60 as well as changes to security of tenure and rent control.

The federal government

The federal Budget was tabled on November 4, 2025. It confirms the federal government's plans to cut funding for the Interim Housing Assistance Program (IHAP) which provides funding to provinces and municipalities to support asylum claimants with housing needs¹. This funding cut leaves the City short by \$107 million next year. The rationale for this cut, as noted in the Budget, is to support the Government's 'savings targets'. In alignment with a motion moved through [HS7.2](#), I would like to confirm that I wrote and submitted a letter on September 24, 2025 to The Honorable Lena Metlege Diab, Minister of Immigration, Refugees and Citizenship to express the Committee's deep concern regarding the funding cuts to IHAP. To date I have not received a response.

The federal Budget has earmarked approximately \$7 billion of new funding over the next five years with the goal of expanding transitional and supportive housing in partnership with all orders of government and Indigenous communities. While this represents an important investment in transitional, supportive, community, and co-operative housing supply, it remains inadequate for the challenges we face in advancing the right to adequate housing.

Submitted by Elizabeth Mclsaac, Committee Chair, November 19, 2025.

¹ As of September 2025, the number of refugees identified as 'actively homeless' in Toronto was 4,781. See [Shelter System Flow Data – City of Toronto](#).