
RE: Data Cited on HRAC Item 2025.HS7.3

16 September 2025

Dear Members of the Housing Rights Advocacy Committee,

On behalf of the FMTA, I would like to clarify data referenced in submissions by various fellow tenant advocates, as presented before this Committee, the Housing Rights Advisory Committee, this morning September 16th, 2025. In our view, the representations unintentionally oversimplify and misinterpret data provided to fellow tenant organizations—as such, we feel the need to correct the record and be clear on the data collected by our organization.

The FMTA presented information with no identifying information that was requested by fellow tenant organizations in late June and August 2025 related to FMTA's Multi-Tenant Housing work. This information is specific to the catchment of one such organization and roughly considers less than 30 addresses in the area of the Downtown East Side of Toronto.¹ Of these addresses, **over 40% are not currently facing eviction** for residences that have been flagged by the City of Toronto as running an illegal rooming house. Yet another 30.2% have faced *the threat* of illegal eviction. **However, of the 30.2% facing these threats, only 3 addresses in the area have been identified as having experienced an illegal eviction as of early August 2025.** An additional 14.6% are in the process of, or have experienced, a formal eviction notice (such as N4 and N13 notices) through the Landlord Tenant Board, with a further 14.6% marked as not having responded to FMTA's request for solicitation.

In light of the above, it is our view that there is no evidence to suggest that the Multi-Tenant Housing By-Law has caused an increase in evictions in the area of Toronto's Downtown East Side. In the case of illegal/informal evictions, loopholes under the provincial *Residential Tenancies Act* (such as subleases or due to a landlord living on the premises) are a much more likely cause for evictions than inspections by municipal authorities. In the case of formal evictions, our data shows all cases in Toronto's Downtown East Side are due to the accumulation of arrears as a result of Toronto's broader affordability crisis. Moreover, at this time, it is unclear whether these evictions were successfully carried out through the Landlord Tenant Board.

¹ The FMTA has a list of over 500 addresses across the City of Toronto that have been flagged as unlicensed Multi-Tenant Residences by municipal officials.

However, we know that evictions are always a threat for *all* tenants in Toronto. The FMTA Tenant Hotline alone—which includes rental housing registered under RentSafe and other residences—registers over 700 eviction threats semi-annually, according to our latest data from the first two quarters of 2025 from the practices of bad landlords. To say that MTH tenants face more threat of eviction than other tenants—particularly in the area in question—would require further analysis and review of the data.

Thus, while the *threat* of eviction from bad landlords is ever present for a wide variety of tenants across the City, successful eviction rates in Multi-Tenant Housing are the exception—not the rule. To suggest that “the MTH Legalization Framework undermines tenants’ right to housing instead of helping further realize tenants’ right to housing” is a misunderstanding of the preliminary data we have presented. Further, this does not speak of the experience of FMTA staff on the ground with tenants nor is this position supported by the FMTA.

We do, however, support the expansion of supports provided to MTH tenants and to organizations attempting to prevent MTH evictions. We are in full agreement with other tenant organizations that more investment in our collective ability to meet these challenges—particularly in the face of a Provincial government which is not stepping up to resolve the longer term issues that tenants face—is a crucial priority.

We support further empowerment of the STAR table and to fulfill promises made to tenants and tenants’ organizations. But we have to do so with a clear eyed approach to the data we have collected. We can both continue to license, regulate, and protect tenants *and* do more to resource impacted tenants. We hope that through the coming budget process and other opportunities that the City chooses to do so in a good way which further our collective goal to end the precarity of MTH tenants and protect all tenants in Toronto.

With respect and in solidarity,



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