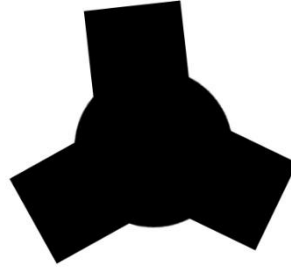


DAWES ROAD TENANTS' ASSOCIATION



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October 30th, 2025

Planning and Housing Committee
Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Attention: Freedom of Information Coordinator/Clerk

RE: Item PH25.16 – *Property Standards By-law: Phase II Review and Other Property Items*

Dear Chair and Members of the Committee,

On behalf of the Dawes Road Tenants' Association, I am writing to express our association's concern that the *Phase II Review of the Property Standards By-law (Chapter 629)* does not address the need for a coordinated, inter-divisional enforcement policy — one that empowers the City to utilize existing remedial action power when property owners fail to comply with property standards by-laws on a prolonged basis, despite repeated orders and prosecutions.

1. The Current Gap

The Phase II report updates key regulations but does not address how the City's divisions (namely, Municipal Licensing & Standards (MLS), Toronto Building, Revenue Services, and Purchasing & Materials Management (PMM), and City Legal Services (City Legal) — can coordinate to ensure compliance in chronic cases.

Tenants including residents in our neighbourhood across Toronto continue to experience prolonged disrepair, pests, mold, and unsafe living conditions even after orders to comply are issued, are confirmed by the local property standards panel, registered on title to properties, and prosecuted at the Ontario Court of Justice. The lack of a city-wide, inter-divisional approach leaves enforcement fragmented and ineffective for the most severe or persistent property standards violations.

2. The Need for an Inter-Divisional Enforcement and Remedial Action Framework

We are calling on the Committee to direct staff to develop a comprehensive **Inter-Divisional Enforcement and Remedial Action Policy Framework** that:

- **Defines clear responsibilities** across divisions (MLS, Toronto Building, Revenue Services, PMM, Legal Services, etc.) for enforcement, escalation, and remedial work.
- **Creates a shared data and coordination system** for tracking repeat non-compliant properties and joint enforcement action.
- **Establishes a defined escalation process**, culminating in City-led remedial work when standard enforcement measures have failed.
- **Provides transparency and accountability** through annual public reporting on chronic non-compliance and remedial interventions.

3. Enabling and Funding City-Led “Remedial Action”

A key component of this framework must be a **formal remedial action mechanism** — allowing the City to directly correct property standards violations when landlords refuse to comply.

We recommend that the Committee direct staff to develop:

1. A dedicated funding strategy to support remedial work on private properties, potentially through a revolving Property Standards Remediation Fund administered by MLS or another division.
2. Contractor procurement protocols, utilizing Purchasing & Materials Management (PMM) to pre-qualify contractors capable of carrying out urgent property standards remediation in a timely, transparent, and cost-effective manner.
3. Oversight from City Legal Services to ensure:
 - That remedial work orders are enforceable;
 - That cost recovery mechanisms comply with legislative requirements; and
 - That liens or property charges are properly registered under the City of Toronto Act, 2006 and Chapter 629 and the Ontario Building Code (as/where applicable)
4. Cost recovery mechanisms, consistent with the authority granted under the City of Toronto Act, 2006 and Municipal Code Chapter 629 (Property Standards), allowing the City to recover all costs of remedial action by adding them to the property’s tax roll as a lien.
5. Criteria for use, outlining when remedial action may be initiated (for example, when an Order to Comply and subsequent enforcement measures have failed, and there is a demonstrable risk to health, safety, or habitability).

6. Reporting requirements to ensure transparency on the number of remedial actions taken, total costs recovered, and long-term compliance outcomes.
 - Annual public reporting on the number, cost, and outcomes of City-led remedial actions to ensure transparency and performance monitoring.

This mechanism would ensure that tenants are no longer left waiting indefinitely for negligent property owners to take action. It also provides a fair, equitable and fiscally responsible pathway for the City to act while maintaining accountability through cost recovery.

4. Our Recommendations

We therefore respectfully request that the Committee **amend the staff recommendations for Item PH25.16** to direct City staff to:

- Develop an **Inter-Divisional Enforcement and Remedial Action Policy Framework**, to be reported back to the Planning & Housing Committee within five (5) months.
- Incorporate a **funding, procurement, and cost recovery strategy** that enables the City to take remedial action and recover costs through tax liens, as permitted under the *City of Toronto Act* and *Chapter 629*.
- Pilot this framework in areas high-need area such as Dawes Road, to evaluate its impact on improving compliance and protecting tenants.

5. Closing

We believe this addition strengthens the City's efforts to uphold property standards and ensures that enforcement tools have real, practical impact. Without a proper policy mechanism and supporting inter-divisional coordination, the by-law's intent - to maintain safe and healthy housing for all residents - cannot be fully realized.

We urge the Committee to incorporate these measures into the Phase II report and items for action.

Best regards,



Ryzn Endoh

Chair,
Dawes ACORN Tenants' Association