

Multi-Tenant Houses Regulatory Framework: Implementation Update

Submission to the Planning and Housing Committee

December 2, 2025

Submission by: Right to Housing Toronto



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Councillor Gord Perks
Chair of the Planning and Housing Committee
Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Dear Members of the Planning and Housing Committee,

Re: PH26.3 - Multi-Tenant Houses Regulatory Framework: Implementation Update

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 [PH26.3 - Multi-Tenant Houses Regulatory Framework: Implementation Update](#).

Current context

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), the multi-tenant houses (MTH) framework is an important step toward protecting affordable housing across the city. MTHs (also known as rooming houses) 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).

City staff-proposed changes to the multi-tenant houses framework



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We commend the City for its important and in-depth work to prepare the [MTH implementation update report](#). As outlined in the report, it is promising to see the City take some meaningful steps toward monitoring the implementation of the MTH framework, including by gathering and sharing data on operational insights, licensing and enforcement, interdivisional collaboration, findings from a land economics study, and community engagement activities. The report also proposes some important changes that aim to improve access to the MTH Renovation Program (including the recent introduction of an Operator Concierge service), clarify licensing and zoning requirements, and enhance monitoring and data collection related to renter outcomes.

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.

Ongoing challenges with the multi-tenant houses framework

However, we remain concerned that **the City’s current approach and proposed changes outlined in the staff report do not address the specific situations of potential MTH renter displacement and affordable housing loss under the MTH framework** that [R2HTO](#) and other advocates have noted previously, including as a result of:

- 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 staff report).

Moreover, **the staff report identifies several ongoing challenges with the implementation of the MTH framework, without offering concrete solutions**, including:

- The six-room limit is discouraging some operators from coming into compliance with the framework due to application costs and process uncertainty related to Committee of Adjustment approvals.
- The six-room limit could restrict the development of new MTHs due to poor financial feasibility.
- Many MTH operators are concerned about complying with the framework due to prohibitive costs, including for renovations.
- Some MTH operators are altering their operations to avoid complying with the framework (e.g., by converting to a single housekeeping unit or reducing the number of rooms).



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- The City is not tracking outcomes for displaced MTH renters (e.g., related to enforcement orders or changing operations).
- The City is not tracking the loss of individual MTH rooms.
- The City has not been able to gather sufficient data on unlicensed MTHs.

While we welcome the City's proposed changes to monitoring and data collection related to renter outcomes, as well as enhancements to improve access to the MTH Renovation Program, we remain concerned that the City's proposed approach does not adequately address the ongoing gaps in the MTH framework. Specifically, **the staff report does not propose to commit any new funding toward MTH renter supports or MTH preservation, address ongoing challenges related to the six-room limit, or provide meaningful opportunities for engagement with MTH renters, operators, and advocates to support monitoring, enforcement, and accountability.**

Moreover, while it is encouraging to see the launch of the Situation Table for Housing-At-Risk (STAR), **we are concerned about the limits of its focus and reach, both in terms of the number and scope of cases that it can support, as well as its ability to influence policy change.** As we outlined in our recent [submission](#) to the Housing Rights Advisory Committee (HRAC), the STAR table appears to no longer have the important mandate to (among other key activities):

- Provide recommendations to address policy and program gaps that contribute to affordable housing loss, housing precarity, and displacement.
- Review and improve data collection efforts related to affordable housing loss, housing precarity, and displacement.
- Monitor the implementation and impacts of the MTH framework and other City rental housing policies and programs as it relates to affordable housing loss, housing precarity, and displacement.

The staff report notes that the City will continue to leverage the HRAC to review and recommend improvements to the MTH framework. However, the HRAC would not be able to provide oversight, as was initially recommended by Council, and has limited capacity and several other critical housing rights issues within its purview to monitor. In addition, HRAC's membership does not include a broad range of MTH-specific expertise. With the STAR table's diminished mandate and the HRAC's limited capacity, **the City does not have a dedicated advisory body in place to oversee the implementation of the MTH framework and ensure that it is upholding the right to housing by protecting MTH renters and mitigating renter displacement and affordable housing loss across the city.**



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.** These recommendations are based on engagement with MTH advocates across the city and build on our [response](#) to the City's survey on year one of the MTH framework and our recent HRAC [submission](#):

1. Provide meaningful support for MTH renters

- a. Displacement protection:** The City should develop targeted programs and policies to support 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 establishing an MTH Advisory Group (building on the work of the HRAC outlined in the report) 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.

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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