Multi-Tenant Houses Regulatory Framework: Implementation Update

Submission to the City of Toronto Planning and Housing Committee

December 2, 2025

Canadian Centre for Housing Rights

Summary of Recommendations

1. Provide meaningful support for multi-tenant housing renters.
2. Remove restrictive multi-tenant housing requirements.
3. Increase funding for multi-tenant housing preservation.
4. Strengthen multi-tenant housing monitoring, enforcement, and accountability.

About CCHR

The Canadian Centre for Housing Rights (CCHR) is Canada's leading registered charitable organization working to advance the right to adequate housing. For over 35 years, we have worked tirelessly at the intersection of human rights and housing, providing free services to renters facing evictions and human rights violations to remain housed, providing education and training about housing rights across Canada, and advancing rights-based housing policy through research, policy development, advocacy, and law reform.

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).

Our work with multi-tenant houses

CCHR is pleased to support the City in developing and delivering "housing as a human right" training for all housing-related staff, including those involved in the implementation of the MTH framework. We also provide ongoing support to MTH renters through our legal and research work as part of the Toronto Tenant Support Program (TTSP).

Anecdotally, CCHR's legal services team has had a steady stream of MTH-related cases overall since May 2025, with spikes in June and August 2025. To date, the key issues we are seeing in MTH-related cases are informal evictions and evictions for landlord's own use (N12).

CCHR is also in the process of conducting research aimed at understanding the impact of the MTH framework on renters. Preliminary findings indicate that the enforcement of the MTH framework has not been a primary factor in renter displacement or housing instability thus far. However, there have been a couple of cases where the implementation of the framework has contributed to housing instability due to ongoing unlicensed operations and operator sales or conversions. The research has also revealed a widespread lack of awareness of the framework among MTH renters.

In addition, CCHR coordinates 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. R2HTO has been engaging closely with MTH advocates across the city and leading key advocacy efforts to ensure the City's MTH framework is upholding the right to housing by protecting MTH renters and preserving affordable housing.

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

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.

Ongoing challenges with the multi-tenant houses framework

However, we remain concerned that **the City's current approach and proposed changes outlined in the MTH implementation update 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:

Canadian Centre for Housing Rights

- 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).

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, given the narrow mandate of the Situation Table for Housing-At-Risk (STAR) and the limited capacity of the Housing Rights Advisory Committee (HRAC), 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 support the following recommendations put forward by R2HTO, based on engagement with MTH advocates across the city:

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 Committee (building on the work of the Housing Rights Advisory Committee 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.
    b. **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 Situation Table for Housing-At-Risk (STAR) 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. To protect this critical part of Toronto's affordable housing infrastructure and the people who live there, we strongly urge the Committee to bring forward and/or vote in favour of any motions that support the recommendations outlined above. In addition, 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.

Sincerely,

Sara Beyer
Manager of Policy
Canadian Centre for Housing Rights (CCHR)