



**DISABILITY JUSTICE  
NETWORK** of ONTARIO

## **Subject: Revisions to the Multi-Tenant Housing Bylaw (Item 2025.PH26.3)**

**2 December 2025**

Dear Chair Perks and Members of Planning and Housing Committee:

I write to you as a resident of Toronto-St. Paul's Ward and as the Executive Director of Disability Justice Network of Ontario. We have previously written to you on related topics to the multi-tenant housing bylaw—including the devastating impacts of Bill 60. As such, we must interject at this moment to warn you against the impacts of some changes being suggested, some changes being advocated for, and some changes which need to be made to this Bylaw (and the wider framework of the zoning bylaw).

### **Building to Premises**

In the first explanatory note for this Bylaw amendment, staff have helpfully noted that the change from building to premises is to align “with the language used in definitions for other congregate living arrangements such as group homes, residential care homes, nursing homes and retirement homes.” In other delegations, you have heard about the concern about this change—from the impacts of an increase in the number of units covered to require licensing to an effective exemption to consider maintenance of common areas around licensing. Further to this, I would add: if we are looking at the overall quality of service from landlords that this definition seeks to align with—group homes, residential care homes, nursing homes and retirement homes—this is a poor standard to align this bylaw with. Operators of these facilities already operate with impunity towards disabled tenants on countless issues of maintenance and provision of accessible units. We cannot suggest that lowering the standard of the MTH bylaw to these facilities would be a positive step for all tenants, but particularly disabled tenants.

### **Other Congregate Facilities**

We would also suggest that it is time to take lessons learned from the new MTH bylaw, including some of the amendments made here, and apply them in the other direction: to other congregate living arrangements such as group homes, residential care homes, nursing homes and retirement homes. Running a low quality student residence or an unaccountable private long-term care facility should not exempt facilities from the innovative accountability mechanisms that have begun to be developed under this Bylaw. Having worked with countless congregate living facility tenants across Ontario, we know that **more regulation** is needed in every single one of these facilities—and the MTH model is one we would like to see expanded, whether through this section or other areas of the Bylaw.



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### **Accessibility Standards for Parking and Units**

We are pleased to see the accessible parking standard gap being fixed with these amendments, but we would remind the Committee: there is a much greater need in the community for accessibility standards for units. We believe that, through a licensing regime such as the MTH Bylaw, compliance to city-led accessibility standards could be moved forward with. You already have a working group which could take on some of these issues—the Accessible Housing Working Group—which has provided similar (unimplemented) standards for city-owned and city-supported properties. It is time to expand those requirements for city-licensed facilities as well.

### **Regulation is Required: No Exceptions.**

We need to continue to move forward with this Bylaw in a way that increases, rather than undermines regulation. Meaning, we need clear additional funding and support for enforcement, clear continued support for tenants to understand their rights, and clear consequences for landlords who fail to comply. There are simply too many stories of landlords trying to skate by and avoid licensing already.

So, therefore, any suggestion through this process to deregulate the MTH sector (rather than expanding the width and depth of this and similar bylaw sections) is a fundamental misstep for Toronto tenants. You may hear from housing providers and other landlords—but no matter their role, we demand that you stick to the path of regulation, enforcement, and tenant protection.

Enough of landlord/tenant law has been tilted away from justice and away from accountability—we must fight back against this and the MTH bylaw remains a tool we could use to achieve some measure of justice by and for tenants.

With sincerest respect,

A handwritten signature in blue ink, appearing to read "Brad Evoy".

Brad Evoy,

**Executive Director, Disability Justice Network of Ontario  
Co-Chair, Accessible Housing Network**