



FEDERATION OF
METRO TENANTS'
ASSOCIATIONS

Re: PH26.3 Multi-Tenant Housing Regulatory Framework

The Federation of Metro Tenants' Associations is a non-profit dedicated to supporting and educating tenants, advocating for tenant rights, and organizing in the community. The FMTA supports regulating rooming houses so that all tenants in Toronto can have access to safe, healthy housing and we would like to commend city staff in their efforts to improve the living conditions of a layer of tenants that have been ignored for far too long. As part of that effort, our Rooming House Organizer has been on the front lines reaching out to affected tenants and we have seen how the implementation of this bylaw on the ground may not be going according to plan.

Our primary concern is the tenants. In particular, the FMTA wants to ensure that vulnerable tenants are being protected from displacement at a time when the housing market is at its most precarious and homelessness is on the rise. This includes but is not limited to seniors, newcomers, migrant workers, people with disabilities, and those facing addiction or mental health barriers. These are the tenants most in danger of becoming unhoused and as such the most in need of further protections.

In particular, the FMTA would like to highlight the following areas of concern with regard to the recent proposed changes in the MTH By-Law:

1. Exclusion of MTHs in Apartment Buildings

As highlighted by Justin Cowan of the [Charles Street Tenants Association](#), the proposed change from “building” to “premise” in the MTH framework would exclude MTH rooms in apartment buildings. This removes increased tenant protections initially provided by the MTH By-Law, allowing for larger, corporate operators to avoid licensing, enabling predatory rental models targeting students and other vulnerable renters.

One such landlord includes [Harrington Housing](#), which has a history of bypassing tenants' legal protections by attempting to take advantage

of legal grey areas. It is the FMTA's position that we need more regulation on MTH operators to fully capture the complexities MTH tenants are having to face.

2. Inadequate Support for Displacement

The 180-day notice period, which indicates the date at which a specific MTH will cease operations, remains unacceptable without guaranteed relocation assistance, temporary shelter, compensation, or structured support. While [de facto and formal evictions](#) are rare, vulnerable tenants who do end up in this situation are offered limited support. This usually takes the form of general referrals to Central Intake rather than warm referrals through more expedient City of Toronto channels—a system that fails without dedicated, proactive support.

Moreover, since inter-municipal referrals, such as with the Situation Table for Housing-at-Risk (STAR), are usually reserved for matters involving Acutely Elevated Risks (AER), many vulnerable tenants may fall through the cracks. Additional infrastructure beyond the current model of situation tables is needed at the municipal level to establish the support vulnerable tenants need. One such proposal is to formalize the existence of the Renter's Action Committee, where policy proposals can be further discussed with broader tenant advocacy groups.

3. Reduced Corporate Accountability

The proposed reduction in documentation required by operators allows corporate landlords to bypass the City's verification process and avoid disclosing director backgrounds. This shields operators with problematic histories from scrutiny, and is especially concerning in cases involving renovation and no-fault evictions. While the City has currently implemented the newly developed Rental Renovations By-Law, there are many other legal loopholes under the Residential Tenancies Act (RTA) that operators can often exploit. This is especially true with "landlord's own use" cases and a number of other loopholes that can be used against tenants, if they do not neatly fit into the definitions of the RTA. With the implementation of Bill 60, this is of

grave concern for the FMTA and affiliated tenant advocacy groups alike. Additional tenant protections are needed to close support gaps, not to weaken operator regulations.

4. Permitting Overcrowding and Unsafe Rooms

While floor plans must now include dimensions, the bylaw still fails to set minimum room sizes, prevent extreme unit subdivision, or address chronic overcrowding in MTH buildings.

5. Reactive, Not Proactive, Enforcement

The MTH framework remains complaint-based, which is ineffective when tenants fear retaliation—and relies on operator-supplied documentation. This is highlighted especially in the recent [Ombudsman report](#) into a vital service outage earlier in 2023. Sadly, these cases are some of the more common ways landlords use to push tenants out of their homes, both within MTH and beyond. Without proactive inspections from MLS, a change in internal culture, and a real enforcement strategy, illegal conversions and hazardous conditions will persist undetected.

The FMTA calls on the City of Toronto to provide greater eviction protections for rooming house tenants. Especially in light of recent developments with the Province of Ontario and the repercussions of Bills 6, 10, 17, and now 60, the City of Toronto must do more to protect tenants across the City. Without these protections, rooming house tenants will continue to live in deplorable conditions, with their rights further infringed. We call on the City to do its part to ensure no tenant is left behind.

Federation of Metro Tenants' Associations

(416) 646-1772

PO Box 73102 Wood St.

Toronto, ON, M4Y 2W5

fmta@torontotenants.org

www.torontotenants.org