

Dear Budget Committee
City Hall
100 Queen Street West
Toronto, ON, M5H 2N2

The Federation of Metro Tenants' Associations (FMTA) is a non-profit that has been organizing tenants and advocating for their rights since 1974. We are the oldest and largest Tenant Federation in Canada. The FMTA is partially funded by the Toronto Tenant Support Program (TTSP).

Recommendations

1. A one time shift of \$10 million funding from Toronto Police Services (TSP) to Toronto Tenant Support Programs (TTSP), equivalent to doubling TTSP's funding for five years.
2. Expand TTSP and develop upstream support for vulnerable tenants involving city divisions and community partners.
 - a. Track tenant outcomes from evictions to understand the full impact development policies are having.
 - b. Collect data to bring eviction policies more in line with housing as a human right.
 - c. Improve tenant support with crisis-trained responders.

Background

Profit-Driven Evictions

It is often stated that the housing market responds to supply and demand and that housing prices are high due to a lack of supply. However, there is a stark difference between real supply and demand based on human need for adequate shelter and the supply and demand of financialized housing as dictated by investment strategies¹. The Canadian Mortgage and Housing Corporation (CMHC) is clear about which definition of supply and demand it responds to, stating in its July 2025 report that a record high supply of 25,572 condo units were completed in 2024 but won't sell due to a lack of demand stemming from the dampening effect high interest rates have on willing

¹ August, Martine & St-Hilaire, Cloé. (2025). *Financialization, housing rents and affordability in Toronto*. Sage Journals, vol 57, no 5. <https://doi.org/10.1177/0308518X251328129>

investors². Even with a 15% increase in average rent since 2022, condo investors in Toronto are facing a 6% capital loss due to high carrying costs. So an increased supply has actually increased the cost of housing rather than mitigating it and at the same time has flooded the market to make future investments less viable. With so much riding on Toronto's speculative housing market, this puts the city's financial future at risk.

This dedication to supply side economics is backed up by the financing that housing developers receive from major Canadian banks. Sometimes referred to as "displacement financing"³, these loans incentivize high tenant turnover in order to maximize profitability and make evictions the primary lever to ensure a return on investments. This leaves tenants to shoulder the weight of a predatory housing market. There are those who decry the politicization of housing regulations in an attempt to reduce tenant displacement and homelessness to mere data points stemming from a neutral economic practice. This in and of itself dehumanizes tenants and unhoused people and further negates the role housing policy plays in producing (and reproducing) these harms. Landlords and developers are a far cry from the benevolent housing providers they claim to be. As housing investment firm Mainstreet Equity Corp. has stated quite openly, "The truth is, we're in the business of making money. And the real estate industry happens to be our vehicle for doing that."⁴

Human Rights and Vulnerable Tenants

Access to secure, adequate housing is considered a human right and a matter of international law by the Canadian Human Rights Commission and the United Nations⁵. But it is one thing to claim housing is a human right and quite another to act on it. In Toronto, this right is consistently put to the test by profit-driven evictions. An eviction can be a life-altering event, it can take tenants away from their friends, family, community, health and cultural

² Canadian Mortgage and Housing Corporation. (2025, June). *Condominium apartment market risks in Toronto and Vancouver*.
<https://www.cmhc-schl.gc.ca/observer/2025/condominium-apartment-market-risks-toronto-vancouver>

³ The Shift. (2025). *Banks and Canada's Housing Crisis*.
<https://make-the-shift.org/wp-content/uploads/2025/11/Banks-Canadas-Housing-Crisis.pdf>

⁴ Martine August (2020). *The financialization of Canadian multi-family rental housing: From trailer to tower*. *Journal of Urban Affairs*, vol 42, no 7.
<https://doi.org/10.1080/07352166.2019.1705846>

⁵ United Nations General Assembly. (1948). *Universal Declaration of Human Rights*, article 25.

resources, and even their employment. These effects are heightened for vulnerable tenants who are disproportionately affected by evictions due to their age, status, background, disability, and/or income level, leaving them particularly in danger of becoming unhoused.

A recent report by the Association of Municipalities of Ontario revealed that there has been an 8% rise in homelessness in Ontario in 2025 alone bringing the total to over 85,000 people⁶. In Toronto specifically, the number of homeless people more than doubled in the period of 2021 to 2025, rising from 7,300 to over 15,400⁷. A growing unhoused population puts a financial strain on the city's budget as the costs of building and staffing more shelters far outweigh the costs of keeping tenants housed in the first place. As laid out in the Proposal section below, an alternative is possible.

Criminalizing Low-Income Tenants

As housing becomes less and less stable there has been a distinct uptick in policies and bylaws that target people at the edge of housing security. Often these regulatory changes come from homeowners and landlords and they are not always founded in real experiences. As Canada's Federal Housing Advocate put it, "The housed public is saying they do not feel safe, but there is a huge difference between being unsafe and feeling unsafe"⁸. Nevertheless, this fear is acted upon by Toronto Police. The intersection of housing law and criminal law is complex but studies have found that any interaction a tenant has with Toronto Police increases their chance of being evicted. Researchers have noted that "people who are homeless or experiencing housing insecurity are disproportionately susceptible to being swept into criminal law processes, even for behaviour that is not illegal"⁹. This holds true even if the

⁶ Donaldson, J. et al. (2026, January). *Municipalities Under Pressure One Year Later: An Update on the Human and Financial Cost of Ontario's Homelessness Crisis*. Association of Municipalities of Ontario.

<https://www.amo.on.ca/sites/default/files/assets/DOCUMENTS/Reports/2026/MunisUnderPressure1YearUpdateReport2026-01-13.pdf>

⁷ City of Toronto. (2025, July). *2024 Street Needs Assessment*.

<https://www.toronto.ca/news/city-of-toronto-releases-findings-of-2024-street-needs-assessment-homelessness-survey/>

⁸ The Office of the Federal Housing Advocate. (2025). *What We Heard About Federal, Provincial, and Municipal Responses to Homeless Encampments*.

<https://homelesshub.ca/wp-content/uploads/2025/12/Federal-Housing-Advocates-report-What-we-heard-about-encampment-responses-in-Southern-Ontario.pdf>

⁹ Buhler, Sarah. (2025). *Crim-eviction: Eviction and Social Control at a Residential Tenancies Tribunal*. Osgoode Hall Law Journal, vol 62, no 1. <https://doi.org/10.60082/2817-5069.4098>

tenant is never charged with a crime or if it is the police themselves that cause damage to a unit. Even the threat of eviction compounds existing struggles with income, mental health, and substance use, all factors that can push a tenant into homelessness.

An alternative system is possible. Going off the metrics of Toronto Police's own 2026 budget submission, crime is down across the board in Toronto with the sole exception of theft over \$5,000. At the same time, it is generally found that higher police budgets are not associated with a reduction in crime¹⁰. Regardless, Toronto Police are requesting a \$43 million increase to their collective salaries on top of over \$1 billion already allocated to them on a yearly basis. This would include the introduction of 143 new uniformed officers and while some of these new officers are to fill vacancies left by retirements, given that the current level of enforcement has led to a decline in crime rates it would not seem necessary to further balloon the budget of the single largest line item for tax payers simply for the sake of it. In a fiscal environment in which everyone is expected to do more with less, Toronto Police are requesting to do less with more. On the other hand, if Toronto police can pull themselves up by their bootstraps for just one year the city could shift \$10 million to Toronto Tenant Support Programs (TTSP) which would in turn allow the city to gradually reduce its dependence on law enforcement to solve what is ultimately a social crisis.

Proposal: Five Year Eviction Protection Program

As explained above, the current direction of Toronto's housing regulations in the face of a failing market will put increasing pressure on the city's budget at a time when an economic crisis seems all but inevitable. The Toronto Tenant Support Program can be enhanced to offset these issues. In particular, since the outcomes of tenants who face evictions are not tracked, the full effect of the current wave of mass displacement cannot be accurately quantified. With a \$10 million funding injection, TTSP could double its budget for five years (an additional \$2 million per year) in order to address the root cause of Toronto's affordable housing crisis and protect millions of tenants from undue harm.

¹⁰ Seabrook, Mélanie et al. (2025). *Reducing the Burden of Police Services Through Investment in Promoting Healthy Communities: Challenges and Opportunities*. School of Cities, University of Toronto.
https://schoolofcities.utoronto.ca/wp-content/uploads/2025/04/Reducing-the-Burden-on-Police-Services_Policy-Brief.pdf

Proposed Program Breakdown by Year

1. Increase TTSP funding.
 - a. Immediately hire a cross-organizational outreach team through existing TTSP organizations and community partners for MTH, reno-, and demoviction support (including crisis responder training).
 - b. Make a new call for organizations to fill gaps in support and to track tenant outcomes.
2. Engage new TTSP organization(s) to further address the needs of vulnerable tenants and begin building data on tenant outcomes.
 - a. Establish collaborative work between city divisions.
 - b. Develop and disseminate informational materials.
3. Begin annual reports on expanding data sets from tracking outcomes.
 - a. Inform the development of municipal eviction protections policies.
 - b. Expand cross-organizational organizing teams to enact eviction protection policies.
4. Audit data collection to ensure accuracy.
5. Report on efficacy of increased funding to reduce evictions.

At the FMTA we say, “Together we are strong.” Help us to strengthen our city by working together to ensure all tenants in Toronto have their human rights respected and remain housed.