



April 13, 2026

**SENT VIA EMAIL**

To: Toronto Planning & Housing Committee Members

**RE: PH 29.4 RentSafeTO Update Report**

Dear Committee Members,

We are writing on behalf of No Demovictions to provide comments on Agenda Item PH29.4, and to propose pragmatic solutions to close a problematic loophole in RentSafeTO that would strengthen tenant protections in Toronto's rapidly changing rental housing landscape.

As outlined in our [previous submission to Council regarding RentSafeTO](#), we strongly support measures that improve transparency, accountability, and enforcement in the rental housing system. In particular, we endorsed the introduction of a colour-coded rating system and broader reforms to ensure tenants can meaningfully access safe and well-maintained housing. We continue to believe that strengthening RentSafeTO is essential to advancing housing justice in Toronto.

However, as the City works to improve standards through RentSafeTO, a significant and growing gap in coverage must be addressed.

When purpose-built rental buildings are demolished, they are typically replaced with mixed tenure developments – primarily condominium buildings that include replacement rental units secured on title, and often additional affordable rental units delivered through City programs. While these units are, by definition, purpose-built rental housing, they are currently excluded from RentSafeTO because they are located within mixed tenure buildings and therefore fall outside the scope of the Apartment Buildings Bylaw.

This exclusion has serious implications. Tenants returning to replacement units, or moving into newly created affordable units, may find themselves with fewer protections and reduced access to enforcement mechanisms than they had in the buildings that were demolished. In effect, as Toronto “replaces” rental housing, it risks eroding the very standards it is trying to uphold.

At the current pace of redevelopment, this gap could result in a net loss of rental units protected under RentSafeTO, despite the City's efforts to preserve and expand rental supply. We are therefore urging the Committee to take immediate action to close this gap by expanding RentSafeTO to include replacement rental units and affordable rental units located within mixed tenure buildings.

This can be achieved through a straightforward amendment to Chapter 354 (Apartment Buildings), including:

- Updating the definition of “apartment building” to include buildings with three or more storeys and ten or more purpose-built rental units, regardless of whether those units are located within a mixed tenure building; and
- Introducing a definition of “purpose-built rental unit” as a residential unit with rental tenure secured on title and/or through an agreement with the City of Toronto (including Section 111 Agreements).

This change represents a clear example of “low-hanging fruit.” Because these units replace existing purpose-built rental housing, their inclusion in RentSafeTO would not significantly increase the number of buildings subject to the program or create substantial new resource pressures for implementation.

We also encourage staff to explore practical process adaptations to support this expansion, including:

- Developing an inspection framework that applies specifically to rental units within mixed tenure buildings, without extending inspections to condominium units; and
- Integrating RentSafeTO ratings into the City’s RentSafe Access System, so that prospective tenants can view building scores directly alongside unit listings.

Closing this loophole is essential to ensuring that tenants do not lose protections simply because their homes have been redeveloped.

Finally, we reiterate the broader recommendations from our previous submission, including the implementation of a visible, colour-coded rating system, stronger enforcement mechanisms, and expanded tenant access to information. These measures, alongside the proposed expansion, would significantly improve the effectiveness and fairness of RentSafeTO.

Toronto has made important commitments to protect and expand its affordable rental housing stock. Ensuring that all purpose-built rental units, ***regardless of where they are located***, are held to consistent standards is a necessary step toward fulfilling those commitments.

We urge the Committee to adopt this recommendation and direct staff to report back on implementation.

Sincerely,  
The No Demovictions Team