



Centre for Equality Rights in Accommodation  
Centre pour les droits à l'égalité au logement

**October 13, 2020**

**Economic and Community Development Committee**

**Written submissions re: EC 16.1: Interim Shelter Recovery and Infrastructure Implementation Plan**

Dear Members of the Economic and Community Development Committee, City of Toronto

The Centre for Equality Rights in Accommodation (CERA) has been working to advance the right to housing and progressive housing policy in Toronto and Ontario for over 30 years. We have also stood on the frontlines of eviction prevention in Toronto and have worked tirelessly to prevent people from losing their homes.

The COVID-19 pandemic has exacerbated the housing and homelessness crisis in Toronto. Since the outset of the pandemic, tens of thousands of Torontonians have lost the ability to pay rent while encampment sites have increased across Toronto at an alarming rate. CERA applauds the urgency with which system partners across the City have been learning and working together to address the housing related emergencies that have been made worse by COVID-19. We are calling on all systems partners, including this Committee, to act with the same urgency and cooperation in dealing with the looming eviction crisis and inevitable worsening of encampment conditions due to the onset of winter.

We are pleased to see that the City's approach to serving encampment residents as outlined in the [Interim Shelter Recovery and Infrastructure Implementation Plan](#) reflects the City's commitment to a human rights-based approach to housing policy. While it is critical to ensure encampment residents have access to safe shelter and housing, CERA is encouraged to see the City's response to serving encampment residents also prioritizes the safety of those in encampments by providing essential supports directly to encampment residents and working with community partners to build a trusting relationship between the City and these residents.

CERA stands in full support of the City's goal of prioritizing preventative measures, including expanding eviction prevention supports, as a means of tackling homelessness. As an agency that provides a key program for keeping tenants housed and preventing eviction into homelessness, we were encouraged by the City's rapid action at the outset of the COVID-19 pandemic to expand eligibility for the Rent Bank. We urge the City to further expand access and eligibility to both the Rent Bank and the Eviction Prevention in the City (EPIC) program as a key way for preventing evictions into homelessness. We also urge the City to continue to advocate to other orders of government for legislative changes to extend eviction prevention measures and enhance residential rental assistance programs. This includes advocacy focused on urging the Government of Ontario to reinstate a moratorium on residential evictions.

As the COVID-19 pandemic continues, CERA is deeply concerned that tenants across Toronto face an increasing risk of being evicted into homelessness due to an inability to pay their rent. The numbers

justify this concern – between March and July, 2020 the Landlord and Tenant Board processed over [6,000 eviction applications](#) for non-payment of rent. Now that the Province has lifted their moratorium on residential evictions, it is only a matter of time before these – and an unknown number of eviction applications filed since then – are processed, and an unknown number of evictions are carried out. Given the unprecedented risk of increased homelessness that may result from an eviction crisis made worse by COVID-19, we are concerned that the City’s plan to provide an additional 560 shelter spaces may not be sufficient to deal with this risk if current eviction prevention supports/programs are stretched beyond capacity. It appears that the City’s plan for creating 560 additional shelter spaces is directly related to an estimated number of people currently living in encampments who will seek indoor shelter during the winter. We urge the City to also plan for an unprecedented spike in individuals and families seeking access to shelters due to eviction, and increase the number of shelter spaces available to address this situation. But most importantly, we urge the City to take all steps it can to ensure that more people don’t lose their homes in the first place.

The eviction of tenants during a global pandemic poses a serious risk to the public health of all Torontonians and is a violation of the Right to Housing. We look forward to working with every member of this committee to prevent evictions into homelessness and ensure Toronto’s shelter system can continue to respond to the fallout from the COVID-19 pandemic.

Thank you,

On Behalf of the Centre for Equality Rights in Accommodation.