



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

June 26, 2021

Deputy Mayor Ana Bailão  
Chair of the Planning and Housing Committee  
City of Toronto  
10<sup>th</sup> floor, West Tower, City Hall  
100 Queen Street West  
Toronto, ON M5H 2N2

Dear members of the Planning and Housing Committee

**Re: Planning and Housing Committee PH25.10 – A New Regulatory Framework for Multi-tenant Houses**

I am writing on behalf of the Centre for Equality Rights in Accommodation (CERA), a non-profit organization working to advance the right to adequate housing. For over thirty years, we have worked tirelessly at the intersection of human rights and housing. CERA advances the right to adequate housing by providing free services to renters facing evictions and human rights violations to remain housed, by providing education and training about housing rights across Canada, and by advancing rights-based housing policy through research, policy development, advocacy and litigation.

For years, we have urged the City of Toronto to harmonize the regulatory and licensing requirements for multi-tenant houses across the city. The City's proposed multi-tenant housing framework recognizes the importance of multi-tenant houses in providing a range of housing choices for our residents. It also takes a human rights approach to finally address a discriminatory bylaw practiced in many parts of our city for far too long. We are in support of the City's proposed regulatory framework for multi-tenant houses. Regulating and licensing multi-tenant houses will help many renters live in safe and adequate homes, while creating more vibrant neighbourhoods across Toronto where residents can live in harmony with one another.

On May 17, 2021, we held a workshop to hear from communities across the city about the proposed framework, especially from those living outside the downtown core. Nearly all our workshop participants were in support of the proposal. In our discussions with these stakeholders, most expressed the need for proper education and outreach to renters and housing providers about the new framework. Additionally, many were vocal on the need for the City of Toronto to commit to a city-wide

no displacement policy that will protect those living in unlicensed multi-tenant houses from losing their homes.

We agree that it is imperative that the City of Toronto takes a proactive approach to prevent displacement of residents who currently live in unregulated and unlicensed multi-tenant houses. The City's proposal for a phased implementation plan will play an important role in ensuring that people do not lose their home and are not displaced from their communities. A human rights approach to this regulatory framework must be rooted in a proactive no displacement policy that would prevent evictions and support residents by way of legal help and access to financial resources.

We know that the best response to homelessness is eviction prevention, and we urge the City to make a commitment that residents will not lose their home as a result of this regulatory framework.

The proposed licensing framework will also help many multi-tenant homeowners to stay in their neighbourhoods and pay for their growing housing costs. Licensing also means that multi-tenant housing operators will properly manage their properties, which not only benefits the residents of these homes who will live in safe and adequate conditions, but it also benefits the neighbourhood at large. These can range from reduced garbage and waste issues to proper pest management, and well-maintained houses. The neighbourhoods will also benefit from a licensing framework as more correct statistical information about these communities will be made available to the City of Toronto and other government bodies, which will help with proper needs assessments and the allocation of funds and resources to these neighbourhoods. This can lead to better roads, enhanced transportation services, as well as meeting some of the service needs of these neighbourhoods.

Vibrant neighbourhoods start with the health and safety of all residents. Prosperous communities start with adequate housing choices available to all residents. It is time that the leadership at the City of Toronto regulate and license all multi-tenant houses across our city.

Thank you,

Bahar Shadpour

Manager of Policy, Communications and Engagement

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