



Advocacy Centre for Tenants Ontario
Centre ontarien de défense des droits des locataires

55 University Avenue, 15th Floor, Toronto, Ontario M5J 2H7
Phone: 416-597-5855 1-866-245-4182 Fax: 416-597-5821
www.acto.ca

Submission to the Licensing and Standards Committee of the City of Toronto regarding Rental Apartment Buildings: Results of Public Consultation and Proposed Regulatory Regime

**November 30, 2016
Agenda item LS15.3**

This submission is made on behalf of the Advocacy Centre for Tenants Ontario – a community legal aid clinic with a provincial mandate to advance and protect the interests of low-income tenants.

It should be clear from the staff report that the current property standards inspection and enforcement program has not been effective in maintaining minimum standards in multi-unit rental buildings. The people who participated in the public consultation process about the proposed licensing framework reported the following issues:

- Landlords are not making repairs despite repeated requests
- There is inadequate lighting and broken machines in laundry rooms
- Elevators are often breaking down
- Units suffer from infestations, including: mice, bedbugs, rats and raccoons
- Garbage is not being collected
- Apartment buildings are poorly ventilated with hallways that are too cold in the winter and too hot in the summer
- Superintendents are not hiring qualified people to do repairs
- Fridges and stoves in apartments are not working or are so old they need to be replaced
- There is mould in units that threatens the health of tenants and their families
- Hallways in some buildings are filthy
- Garbage chutes are closed, and
- Tenants fear retaliation from their landlords if they complain.

These conditions are eroding the enjoyment of life for the residents of these buildings. While tenants are paying full rent, the City has not provided a workable solution to landlord neglect. But high rents and a low vacancy rate prevent them from moving to a building in a better state of repair. The staff report proposes to strengthen enforcement of the City's by-laws, to enhance tenant engagement and access to information and to promote preventative maintenance. It recommends new fees and penalties for landlords, a requirement for new plans from landlords and an increase in staff resources. Clearly these are all needed and we urge the Committee to recommend to Council that they be immediately adopted. However, more can be done to protect tenants from these unacceptable conditions.

Here are the further recommendations we have to address shortcomings in the staff report:

1. Provide more resources for inspections and enforcement. The 30 total staff, with 20 of these being Municipal Standards Officers (MSOs) is not enough to meet the need for the over 350,000 rental units that this program will apply to.
2. Increase the maximum penalties for landlords who do not comply with the City's by-laws so that the rate of compliance is improved.
3. Ensure that tenants are fully informed about how they can have their property standards complaints investigated and resolved and protect prospective tenants by requiring a rating system that posts information on buildings in a way that is similar to the DineSafe program for restaurants.
4. Change the property standards by-law to ensure that required repairs and maintenance are completed in a timely manner by specifying timelines and limiting the ability of the Property Standards Appeals Committee to grant extensions for compliance with the law.
5. Remove the barriers to tenants making property standards complaints. Direct the staff to develop a protocol to be prominently posted on the City's website for receiving and responding to complaints and inquiries from tenants and their representatives.

It is vital that you let Council know that Municipal Licensing and Standards needs an adequate budget and strong direction to do this work. We cannot allow tenants to continue living with these conditions. Council must tell landlords and the staff at Municipal Licensing and Standards that these conditions will not be tolerated any more.