

HOUSING HARDSHIP

How Ontario's Renters Struggle to Keep a Roof Overhead



Advocacy Centre
for Tenants Ontario

Tenant Duty
Counsel Program

2023



Acknowledgements & About

This report was prepared by the Advocacy Centre for Tenants Ontario (ACTO). The first part of the report examines the cost of living and affordable rental housing crisis in Ontario. It primarily draws on data from the recently released 2021 federal census data and a 2022 public opinion poll of Ontario renters, conducted by EKOS and commissioned by ACTO. The second part of the report outlines recommendations for how all levels of government may work together to address the crisis and provide support for renters.

The Advocacy Centre for Tenants Ontario (ACTO) is a specialty community legal clinic with a province-wide mandate to advance and protect the interests of tenants living on lower incomes. ACTO specializes in housing issues related to tenants. Through its Tenant Duty Counsel Program (TDCP), ACTO also provides legal services to unrepresented tenants with hearings at the Landlord Tenant Board across the province.

Thank you to the staff at EKOS for working with us to conduct a public opinion poll of Ontario's renters. Our gratitude and thanks to the Tenant Duty Counsel Program team and other community clinic legal workers for providing us with the anecdotes and quotes that illuminate the depth of the hardships for Ontario renters.

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Introduction

Ontario is in crisis.

31.4% of residents rent their homes, and almost 4 in 10 of these renter households pay unaffordable rents. The disastrous effects of rising costs of living, the financialization of housing,¹ and corporate greed are not borne equally among Ontarians. It is renters that struggle most acutely, with 24.9% of renter households in core housing need compared to just 6.4% of homeowners.

Though the stage was set for an affordability and housing crisis long before the arrival of COVID-19, the pandemic exacerbated these fractures of inequality. Many low- and moderate-income renter households are employed in industries that were hit hard with job losses and income losses. Others are essential workers and are therefore at higher risk of exposure. Others still lack the paid sick days needed to isolate and recover in case of illness. These impacts of COVID-19 are ongoing, reverberating through the lives of renter households into 2023. Yet, very little is being done to help them, as many of the supports and measures provided at the outset of the pandemic have since been phased out.

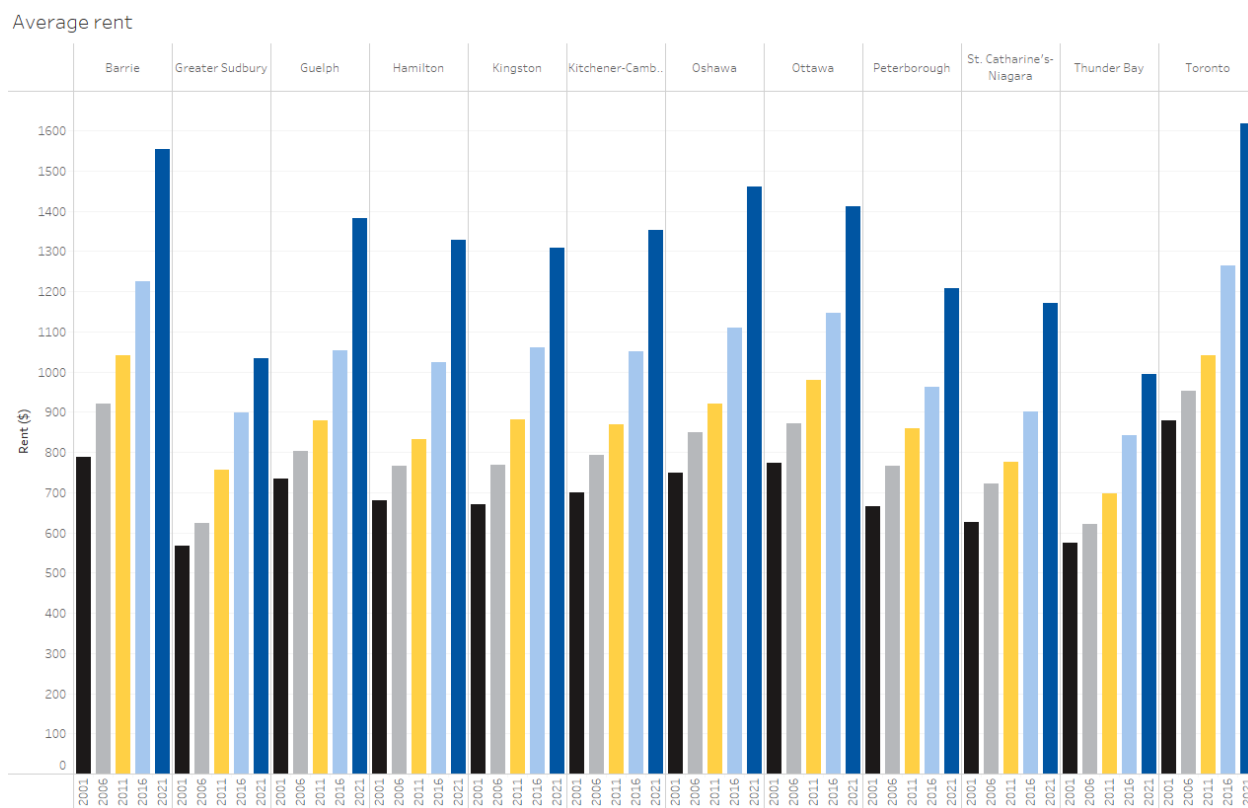
In 2018, we published the report *Where will we live? Ontario's Affordable Rental Housing Crisis*. We wish we could show that things have gotten better for Ontario's 1.7 million renter households in the five years since. Unfortunately, as this report will demonstrate, the affordable rental housing crisis has instead grown far worse.

¹ Defined by the Federal Housing Advocate as “a term used to describe how housing is treated as a commodity – a vehicle for wealth and investment – rather than a human right and a social good for people and communities.” <https://www.housingchrc.ca/en/financialization-housing#what>

Rents are on the rise

The crisis of affordability in Ontario starts with shelter costs, which have sharply increased over the past 30 years. These drastic increases in rent are not just in major municipalities like Toronto or Ottawa -- rents are on the rise across the entire province. Even more troubling, the recent years have seen faster increases, suggesting that this trend will accelerate. As the graph below shows, in Toronto, average rents increased from \$878 in 2001 to \$1264 in 2016, and then jumped to \$1618 in 2021. Likewise, in Ottawa, average rents increased from \$773 in 2001 to \$1146 in 2016, and then jumped to \$1412 in 2021. Similar patterns can be observed in other urban centres across the province.

Average shelter costs 2001-2021²



Alongside increases to average rents, asking rents are also steeply on the rise. Asking rents are the rents charged for available units. These are significantly higher than average rents, since once a unit is vacant the landlord can charge any rent that the market will bear, enabled by the provincial policy of “vacancy decontrol”. In January 2023, average asking rents were \$2457 in Toronto, \$2145 in Mississauga, and \$ 1,950 in Ottawa³. This means that in Toronto, a renter must now earn \$98,000/year to comfortably afford a 1-bedroom rental.⁴ According to the 2021 Census, the median total income of renter households in Toronto was \$65,500.⁵ Asking rents have been increasing even faster in the COVID-19 recovery period, with year to year increases of up to 32% in Kitchener, 21% in Toronto, and 19% in Ottawa, and are expected to increase further as demand for rentals surge with rising interest rates.⁶

CMHC considers housing affordable only when shelter costs do not exceed 30% of one’s gross income. Yet, in Ontario, many thousands of renters are paying well beyond 30% of their gross income towards rent.⁷ This chasm between what renters actually earn versus what landlords are charging for available units is due in part to vacancy decontrol. Vacancy decontrol creates a strong incentive for landlords to remove long-term renters to charge more to an incoming tenant instead. Thus, vacancy decontrol is driving higher rates of eviction. It also increases the cost of housing far above inflation, and discourages renters from moving when necessary due to unaffordable rents elsewhere. CMHC’s Rental Market Report illustrates the impact of vacancy decontrol on the rental market. The report noted that, in 2022, vacancy decontrol sharply increased rents for two bedroom apartments that had turned over by 26% in Hamilton, 17% in Ottawa, and 29% in Toronto; compared to 1.2% for existing renters who were protected by rent control provisions.⁸ As can be seen in graph 2, rents for units that had turned over were significantly higher than rents for units with sitting renters. This has serious implications for renters who want to move or who are evicted, and who are unlikely to find an apartment at a similar price in their community.

3 <https://www.cbc.ca/news/business/marketplace-rental-units-1.6758477>

4. [Rentals.ca January 2023 Rent Report](#)

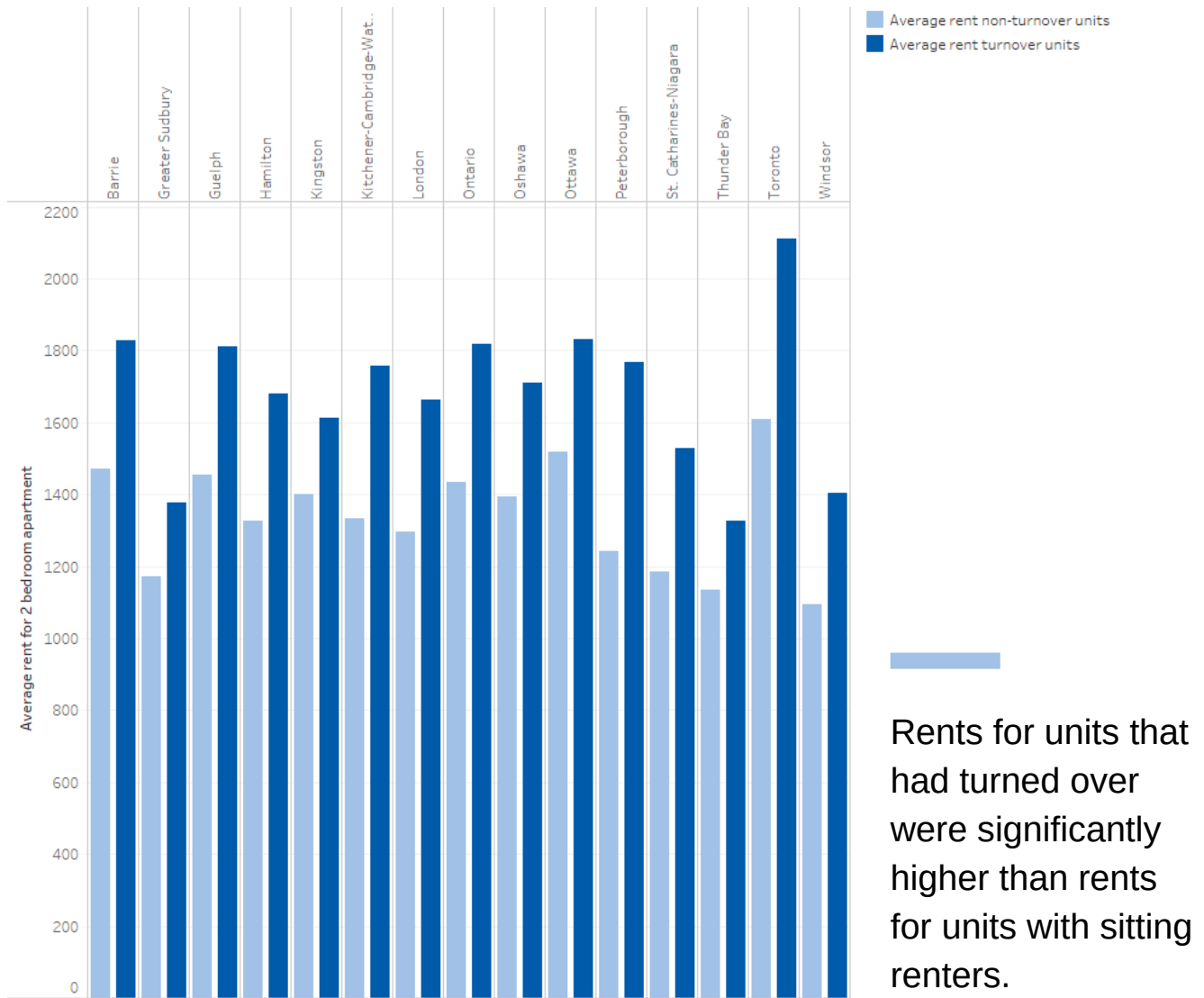
5. Statistics Canada. [Table 98-10-0252-01 Shelter-cost-to-income ratio by tenure: Canada, provinces and territories, census metropolitan areas and census agglomerations](#)

6. <https://www.thestar.com/news/gta/2023/02/10/hoping-to-see-gta-rents-drop-with-home-prices-experts-say-youre-out-of-luck.html>

7 https://www.acto.ca/production/wp-content/uploads/2019/11/FINAL_Report_WeCantWait_Nov2019.pdf

8. CMHC 2022 Rental Market Report <https://assets.cmhc-schl.gc.ca/sites/cmhc/professional/housing-markets-data-and-research/market-reports/rental-market-report/rental-market-report-2022-en.pdf?rev=fc1865db-acac-4be3-979a-e3074b4eb521>

Average rents in turnover vs non-turnover units



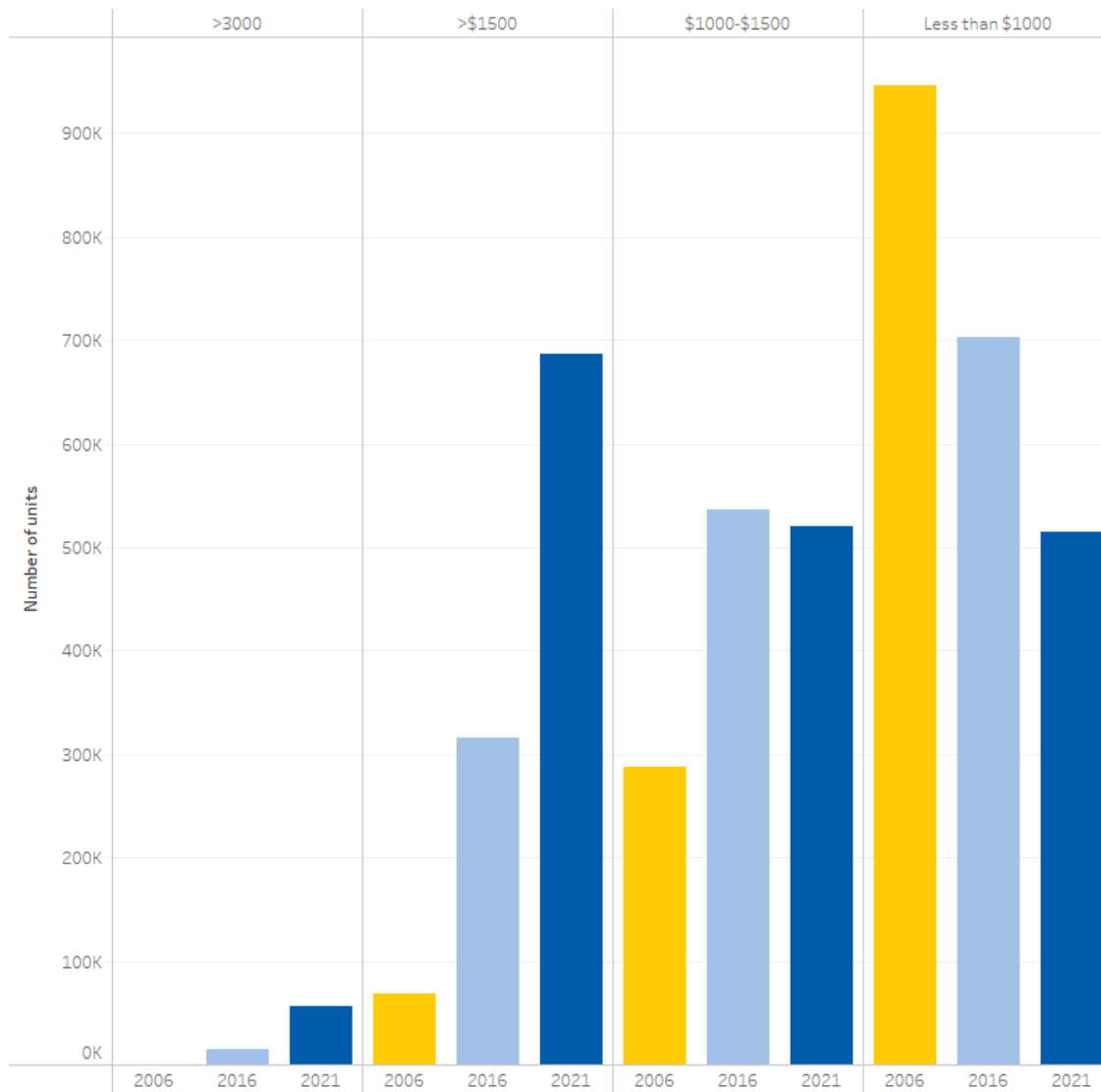
Loss of affordable housing stock

Ontario loses affordable rental housing stock much faster than any new supply is generated. Census numbers from 2006 to 2021 show a large loss in the most affordable rentals, while the biggest increase in number of units added to the market are luxury rentals. The loss of affordable rentals can be attributed to a number of factors, including: lack of investment in new supply of affordable rentals, vacancy decontrol, the financialization of housing, and conversions of affordable units to pricier rentals or condos.

Between 2006 and 2016, Ontario experienced a 26% decline in units that rent for less than \$1000, while units renting for \$1,500 and over increased a shocking 360%. This trend has further accelerated. Between 2016 and 2021, units renting for under \$1,000 have decreased by another 36%. The highest increase has been in luxury rentals, renting for over \$3000, which have increased by 87%.⁹

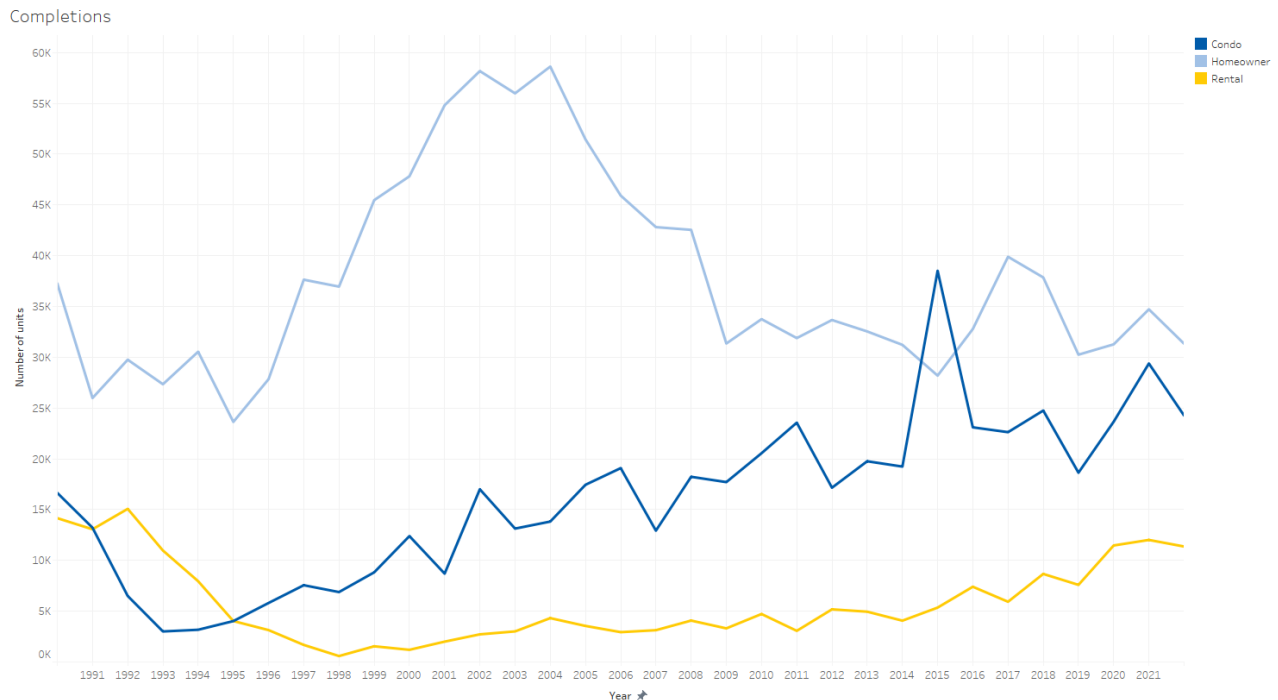
Loss of affordable units in Ontario over time

Loss of affordable units



9. Ontario-Number of apartments. Statistics Canada, Census 2021, Census 2016 and Census 2006

Completions of rentals vs other forms of housing



For the past 30 years, rental construction has lagged behind construction for homeownership. Ontario is not building the number of rentals needed to accommodate a growing demand. This is particularly the case when it comes to affordable rentals. Even though there has been an increase in the number of rentals from the 2010s, these new units are at the higher end of the market. This makes them affordable only to a limited number of rental households. In 2022, the average rent for new supply entering the market was 45.4% higher than the average rent for all units¹⁰. The average rent for a new 1 bedroom apartment in the GTA was \$2,199, affordable only to renters with an annual income of at least \$87,960.

The problem of low vacancy rates

Vacancy rates need to hover around 3% to be considered a healthy rate. In Ontario, vacancy rates consistently fall below that threshold. For example, vacancy rates in 2022 for 1 bedroom apartments were 2.4% in Barrie, 1.3% in Guelph, 2.0% in Hamilton, 1.0% in Kingston, 1.2% in Kitchener-Cambridge-Waterloo, 2.0% in Ottawa, 1.1% in Peterborough, and 1.9% in Toronto.¹¹

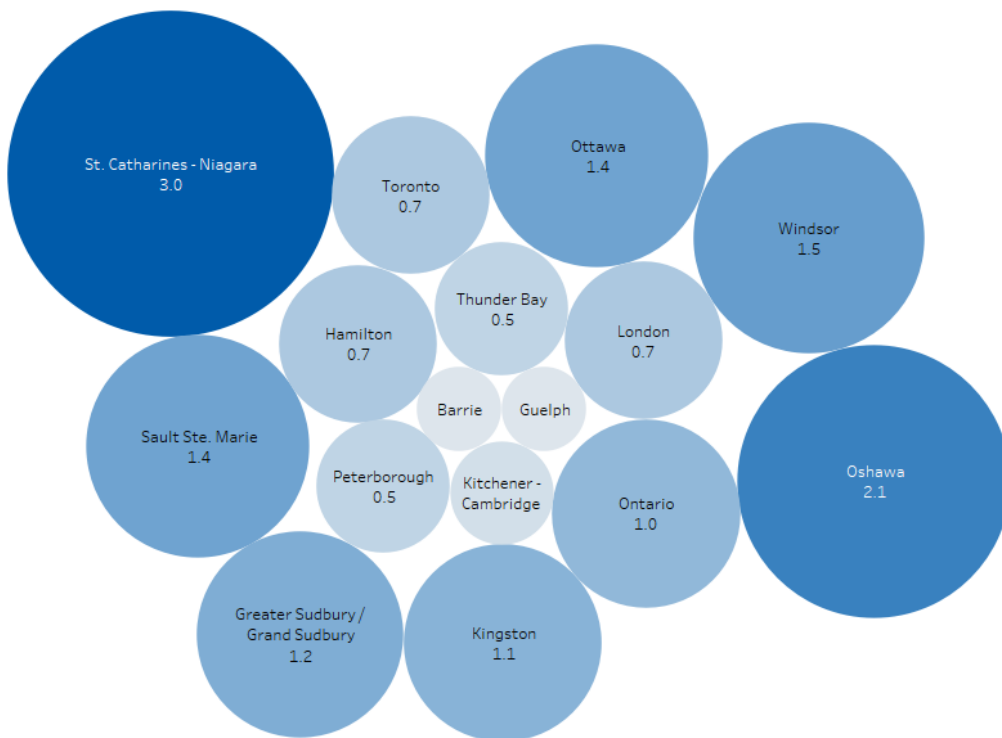
10. CMHC Rental Market Report 2022 [RENTAL MARKET REPORT - January 2023 \(cmhc-schl.gc.ca\)](https://www03.cmhc-schl.gc.ca/cmhc-schl.gc.ca/rental-market-report-2022)

11. Vacancy rate numbers from CMHC Housing Market Information Portal <https://www03.cmhc-schl.gc.ca/hmip-pimh/en#TableMapChart/35/2/Ontario>

More alarmingly, vacancy rates are particularly low for apartments with more affordable rents. For instance, in Toronto, the vacancy rate for apartments with rents between \$750 - \$999 is 1.3%, and 0.7% for apartments with rents between \$1,000-\$1,249. Meanwhile, the vacancy rate for apartments with rents higher than \$1,500 is higher at 2.2%. The same pattern can be observed in other cities across Ontario. In Ottawa, apartments with rents between \$1,000 - \$1,249 have a vacancy rate of 1.3% compared to a vacancy rate of 3% for apartments with rents over \$1,500.¹² It is clear that renters living on low and moderate incomes face an almost impossible task to find an affordable rental.

Vacancy rates for affordable rentals across Ontario

Vacancy rate (\$1,000-\$1,249)

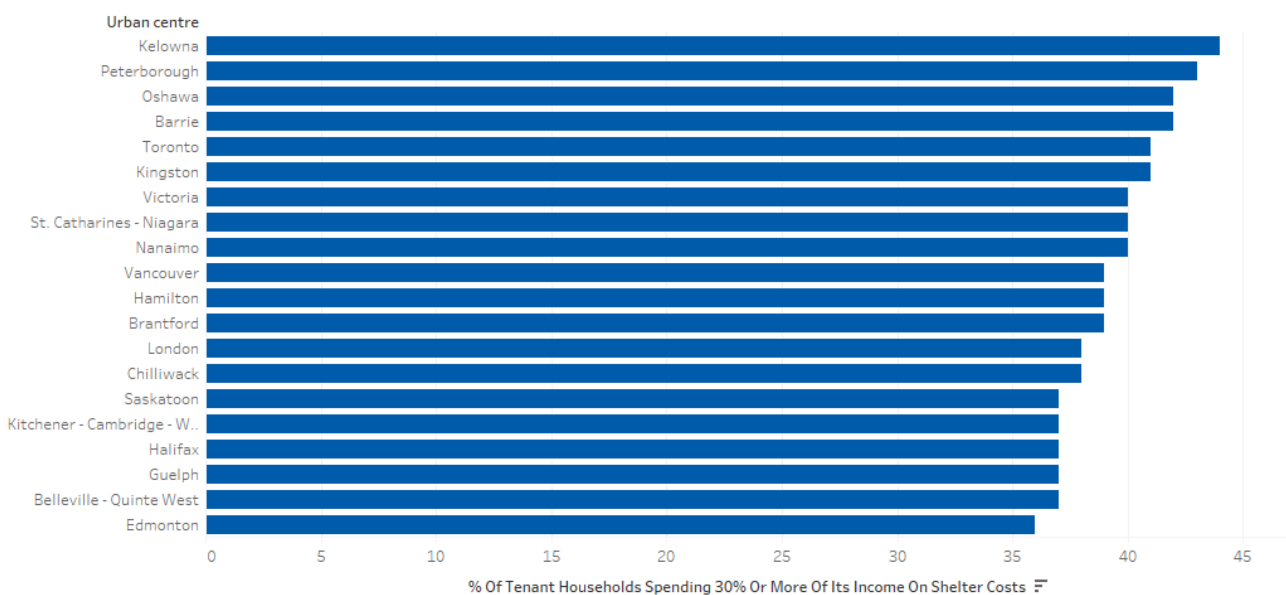


Affordability crisis and the vulnerability of renters

Unaffordable housing costs affect renters across the province. The 2021 Census data shows that out of top 20 most unaffordable census metropolitan areas (CMAs),¹³ 12 are in Ontario, 5 in BC, 1 in Nova Scotia, 1 in Saskatchewan, and 1 in Alberta.

Percentage of households paying unaffordable rents

Percentage of tenant households paying unaffordable rents



Incomes do not keep up with rising rents.

Minimum wage in Ontario is \$16.55/hr. But in Toronto, a renter needs to earn \$28/hr to afford a 1 bedroom rental.



Incomes are not keeping up with rising rents. As can be seen in the next graph, the hourly wage needed for rent to be affordable in Ontario's urban centres is far above the minimum wage. In Toronto, a renter needs to earn \$28 an hour for rent to be affordable for a 1 bedroom, and \$32 for a 2 bedroom. In Ottawa, the "housing wage" would be \$25 an hour for a 1 bedroom and \$30 for a 2 bedroom.

13. A census metropolitan area (CMA) or a census agglomeration (CA) is formed by one or more adjacent municipalities centred on a population centre (known as the core). A CMA must have a total population of at least 100,000 based on data from the current Census of Population Program, of which 50,000 or more must live in the core based on adjusted data from the previous Census of Population Program. A CA must have a core population of at least 10,000 also based on data from the previous Census of Population Program. <https://www150.statcan.gc.ca/n1/pub/92-195-x/2021001/geo/cma-rmr/cma-rmr-eng.htm>

Average wage needed for a 1 bedroom apartment (\$)

Average wage needed for 1 bedroom apartment (\$)



A 2022 Statistics Canada survey found that almost half of respondents in Ontario reported being very concerned with their ability to afford housing or rent. Younger Canadians were more likely to be concerned-- 58% of people aged 15 to 24 years reported being very concerned, followed by 56% of those aged 25 to 34 years. People aged 65 years and older (27%) reported the least concern. Younger Canadians were not the only ones concerned with rising housing prices. Among Black Canadians, 74% reported being very concerned over the cost of housing, as did 65% of South Asians.¹⁴

ACTO commissioned EKOS to conduct a province-wide poll of Ontario renters in 2022. The poll results confirm that renters are being squeezed in an extreme affordability crisis that affects them in every single part of their lives, and very little is being done to help them. Housing costs are the largest expenses for most households, and rising rents are placing pressure to cut back on other essentials.

No one should have to choose between food and shelter. Yet 60% of renters polled said they have had to cut back on food to afford their rents. 74% had to cut back on their other spending to afford their rents. According to Feed Ontario's 2022 report, food bank use has increased 42% over the past 3 years. Food banks also reported that 1 in 3 of all food bank visitors were turning to a food bank for the first time in 2022, which affirms a worsening economic security crisis.¹⁵

These soaring rental rates are pushing more people living on lower incomes into very precarious financial situations. Our EKOS public opinion poll found more than two out of five (41%) Ontario renters are concerned about their ability to pay rent over the next twelve months. Unsurprisingly, lower income renters are more likely to be concerned about being able to pay rent. Nearly six out of ten (59%) of renters with household incomes under \$30,000 are concerned about their ability to pay rent, while half (49%) of renters whose incomes are between \$30,000 and \$60,000 are concerned. Minority groups also expressed greater concern about being able to pay rent, including six-in-ten (60%) Asian renters, over half of Black renters (55%) and seven-in-ten (71%) people of other races. A majority of people with a disability (54%) were also concerned.



Landlords have more power. So renters keep their heads down and live in deplorable circumstances... and it's for good reason.



Renters in Ontario face the additional stress of lacking savings to be able to pay rent should they suffer job or income losses. Nearly two-thirds (65%) of low income renters said they would not be able to pay their rent over the next three months without going into debt if they lost their income. Over two thirds of Black renters (72%), and 68% of disabled renters said they would not be able to pay their rent over the next three months if they lost their income. This kind of financial precarity pushes renters into an increasingly vulnerable position, with some renters who have fallen behind on rent being “pressured into taking out high risk loans to pay it off.”¹⁶ Renters also cite well-founded fears that falling into arrears or being evicted will affect their credit scores and ability to find another unit to rent. As one housing lawyer notes, renters are “just frantic about it. Landlords have more power. So renters keep their heads down and live in deplorable circumstances...and it's for good reason.”¹⁷

15. <https://feedontario.ca/wp-content/uploads/2022/11/Hunger-Report-2022-Final.pdf>

16. Interview with Tenant Duty Counsel Lawyer, September 2022

17. Communication with a Legal Clinic Housing Lawyer, March 2023

Evictions are a grave area of concern

Given the increasing rents and low vacancy rates, it is unsurprising that renters experience strong concerns around the possibility of being evicted. They know that if they are evicted, they are unlikely to find another affordable unit in their neighbourhood of choice.

Almost half (46%) of renters in the province are concerned about their landlord wanting to evict them for some reason. This is particularly true among more vulnerable segments of the population, such as lower income renters and disabled renters. Over half of renters whose household incomes are less than \$30,000 (52%) or between \$30,000 and \$60,000 (55%) are concerned about being evicted and nearly six out ten (58 %) renters who identify as disabled are concerned.

We sought to better understand the experiences around evictions, and asked renters about experiences with evictions over the past decade. Over four-in-ten (42%) Ontario renters have either themselves been evicted (14%), have a friend who has been evicted (26%) or have a close family member (13%) that has been evicted in the last 10 years. Younger renters are more likely to be evicted or know someone who has. Nearly half of Ontario renters under 35 (46%) have been evicted or know someone who has, compared to just 16% of those over 65. Additionally, half of both disabled renters (50%) and members of the 2SLGBTQ community (49%) have, or know someone who has, been evicted.

Of those who have been evicted themselves over the last 10 years, one in three (32%) have been evicted due to the landlord or a landlord's family member wanting to move into the unit. These landlord's own use evictions are the biggest reason given for being evicted. A further 22% of renters evicted cited the unit being sold and the new owner wanting to move in as the reason for an eviction. Twenty per cent mentioned a personal conflict being the reason for their eviction. Landlord's own use and renovations clearly come across as two of the largest drivers for evictions. When including evictions of themselves and their friends or families, over a third (35%) had experienced evictions because of a landlord or family member moving into the unit, one quarter (26%) because the unit was sold, and one quarter (26%) because the landlord wanted to do renovations.

Landlord and/or purchaser's own use evictions (often called N12 evictions, because that is the number of the form used) are especially stealthy. Though there are fines and other restrictions to deter landlords from using these applications to evict renters in bad faith at the Landlord and Tenant Board ("Board"), they still do not prevent these kinds of evictions from being carried out. As one legal worker noted, "There are more N12 notices being served," but highlighted the difficulty in proving whether or not they are being made in bad faith. The same worker recalls one case where "the landlord claimed their son was going to be occupying the unit – I personally know this family and I know the son works and lives full-time in an outlying community."¹⁸

Another legal worker observed that, in many own-use cases, they are seeing the Board make the tenant “prove why they don’t believe the landlord is acting in good faith. The Board is essentially making it a reverse burden on the tenant to prove bad faith, instead of having the landlord go through their own case and prove why they do need the unit in good faith.”¹⁹

These self-reported experiences are reinforced by the available data from the Landlord and Tenant Board itself. 66,174 landlord’s own use eviction application forms were downloaded in 2021; while 71,498 were downloaded from January 1st to October 31, 2022 – an increase of 8%.²⁰ In reality, the numbers of landlord’s own use evictions are likely to be even higher than what the Board reports, since many of these evictions happen informally. From what legal workers have noted, “Landlords are more often than not ‘moving in’ to units that have long-term renters with affordable rent.”²¹ This is how the policy of vacancy decontrol plays out in reality. Landlords are incentivized to get rid of longer term renters, because they know they can make much more money off a new renter. One legal worker noted that they have more renters than ever before saying, “I think my landlord is trying to get me out to get higher rent.”²² There is very little recourse for renters, legal workers, and advocates to stop them.

The impact of evictions

An eviction can be one of the most stressful, costly, and possibly traumatic experiences a renter can have. It is relatively easy to downplay the enormity of an eviction and the upheaval it causes – until it happens to you. ACTO runs the Tenant Duty Counsel Program (TDCP) in Ontario, where legal professionals give free, legal advice to any tenant with a scheduled hearing. The disparity between landlords and renters having legal representation at a Board hearing is stark. Our own research found that 77% of landlords had legal representation at their hearings, compared to only 31.5% of renters.²³ For many of those renters, the only legal representation they received was through the TDC program. Many renters cannot afford to hire representation for their hearing, and only a small number of renters qualify for representation by their local community legal clinic. The free legal support offered by TDC is one of the only things that may prevent a tenant from being evicted.

The difference in tenant versus landlord experiences at Board hearings are further exacerbated by the switch to digital hearings.²⁴ Theoretically, digital hearings may have some benefits for some renters. However, after more than three years of digital hearings, it is abundantly clear that they frequently present even more hurdles for renters to navigate and reduce their access to justice.

19. Interview with Tenant Duty Counsel legal worker, September 2022

20. Letter from the Landlord and Tenant Board, December 15th 2022

21. Interview with Tenant Duty Counsel legal worker, September 2022

22. Communication with a Community Clinic legal worker, March 2023

23. <https://www.acto.ca/production/wp-content/uploads/2021/06/Digital-Evictions-ACTO.pdf>

24. <https://www.acto.ca/production/wp-content/uploads/2021/06/Digital-Evictions-ACTO.pdf>

All of this – pressures from the pandemic, rising costs of living, a lack of affordable rentals and reduced access to justice at the Board – is forcing renters to occupy a very vulnerable position in Ontario. Another legal worker observed that, “There seem to be a considerable number of renters who are being evicted due to hardships related to COVID-19. They lost their jobs, lost family members and/or renters became sick with COVID-19, (many continue to have symptoms or are immune compromised) or otherwise have issues related to the pandemic. What is even more alarming is that a high majority of renters are low-income, female, and racialized renters - many are also single parents with children.”²⁵

Another legal clinic worker notes for many of their clients, “If they’re evicted, they’re homeless. They will not find anywhere to live. And our shelters are full. There’s no housing available. What keeps me up at night sometimes with these hearings is that, if a tenant is on ODSP, and they get evicted... they have no place to go.”²⁶

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25. Interview with Tenant Duty Counsel legal worker, September 2022

26. Communication with Community Clinic legal worker, March 2023

Moving Forward

This province is on a trajectory of rising inequality, rapidly becoming a place divided between the haves and the have nots. No one feels this more keenly than renters. Yet, we must be clear: it does not have to be this way. We can choose differently and shape a better way forward, one where everyone has access to an affordable, safe, secure, and adequate home. The solutions are there, but it will take a concerted effort and coordination from all levels of government to intervene effectively. The crisis is severe and projected to grow worse and so action must be swift.

We have a number of key recommendations below which - if implemented - would go a long way to resolving the rental housing and affordability crisis. We will begin with the solutions that will necessitate cooperation across all levels of governance, which are:

1

DEVELOP A DEDICATED ACQUISITIONS FUND TO RETAIN CURRENT AFFORDABLE HOUSING STOCK

For the past 15 years, Ontario has lost affordable rental housing units without building enough units to replace them. As a result, average rents have rapidly increased as the stock of affordable units has steadily decreased. The same decrease in affordable units has taken place across the country. Nationally, between 2006 and 2016, the number of units renting below \$750 a month declined by 830,000.²⁷ New additions to Canada's rental stock over that same period were typically priced at 140% of the average market rent and therefore did not contribute to the affordable housing supply.²⁸ This trend has continued between 2016 and 2021, with the loss of a further 230,000 low rent units, representing 6% of total unsubsidized rental housing.²⁹ Preserving existing affordable housing rental stock through acquisition is both less expensive than new construction and much faster. With support and pre-approved loans and grants, community housing providers can secure affordable housing in just a few months, rather than the 3-5-year timeline of new construction.

Acquisition is currently not eligible for funding or financing under National Housing Strategy (NHS) programs, such as the National Housing Co-Investment Fund (NHCF) and Rental Construction Financing Initiative (RCFI). Newer programs like the Rapid Housing Initiative (RHI) specifically exclude acquisition of existing residential properties. Similarly, there is no provincially-funded acquisitions program. The City of Toronto's Multi-Unit Residential Acquisition (MURA) is a valuable new initiative but is constrained by limited financial resources. A federal and provincial acquisitions program would support community housing providers in buying existing rental properties and preserving affordability.

27. <https://www.policyalternatives.ca/publications/monitor/our-opportunity-end-housing-poverty>.

28. <https://carleton.ca/cure/wp-content/uploads/CURE-Brief-Federal-Budget-2017.pdf>

29. <https://www.linkedin.com/pulse/new-census-data-reveals-continuing-issue-erosion-lower-steve-pomeroy/?trackingId=bgne37RkR6CwBe2Sx4%2FgUQ%3D%3D>

2

ENSURE THAT NEW AFFORDABLE HOUSING DEVELOPED WITH PUBLIC FUNDS REMAINS AFFORDABLE OVER THE LONG-TERM AND PROVIDES VALUE TO THE TAXPAYER BY PRIORITIZING PROJECTS THAT ARE OWNED AND MANAGED BY THE NON-PROFIT COMMUNITY HOUSING SECTOR.

One of the most effective ways to increase the supply of affordable housing is to invest in the development of non-market rental housing, including social housing, non-profit and co-op housing. They have a proven track record of providing affordable housing for Ontarians for many decades. These stable, secure, and affordable homes are the type desperately needed in communities across Ontario. Freeing up surplus public lands for the development of more affordable housing would be a critical contribution to ending the housing shortage. Surplus lands for residential development should be prioritized for community housing development that will remain affordable in perpetuity.

3

ADDRESS THE FINANCIALIZATION OF HOUSING.

One of the root causes behind our affordable housing crisis is the “financialization” or “commodification” of housing, meaning the treatment of housing as a wealth-generating financial asset rather than a home. We have seen an increase in institutional investors in the rental housing market, including private equity firms, asset managers, publicly listed companies, real estate investment trusts (REITs) and financial institutions. The largest 25 financial landlords (REITs and other types of firms) owned approximately 330,000 units in 2020. This constitutes nearly 20% of the country’s private, purpose-built stock of rental apartments.³⁰ These businesses must, by their nature, maximize profits and therefore pursue ever-increasing rental income. We need all levels of government to commit to addressing the scope and impact of financialization and its harmful impact on housing. Some potential measures include eliminating the preferential tax treatment for REITs, examining the rules around down payments for investment properties, creating a publicly available beneficial ownership registry to eliminate hidden ownership, reining in speculation in real estate, and investing in public housing and non-profit housing.

In Canada, provinces and territories regulate and fund the vast majority of housing policies, programs, and laws. Therefore, the rest of the work needed to address the affordable housing crisis falls to the province. We encourage the province to:

4

ELIMINATE VACANCY DECONTROL AND EXTEND RENT REGULATION TO UNITS BUILT AFTER 2018 TO KEEP MARKET RENTALS AFFORDABLE.

Over 80% of Ontario renters believe there should be a limit to the amount landlords can increase the rent for a unit when it becomes vacant. Existing rent control for occupied units also does not extend to units first occupied residentially on or after November 15th, 2018. We would propose that the government end these two rent control exemptions. In the alternative, the province may institute a rent increase ceiling, or set in place a sunset clause to restrict how long these units would be exempt from rent control.

5

PREVENT DETRIMENTAL IMPACTS FROM BILL 23 ON MUNICIPAL HOUSING PROGRAMS.

Bill 23 proposed significant changes to the *Development Charges Act* and *Planning Act*. Some will be helpful in promoting affordable housing, for example eliminating development charges (DC) for non-profit housing and affordable rental units. However, we are concerned about the financial impact on municipalities of proposed reductions to the market housing development charges, community benefits charges, and parkland dedication levies. Of even greater concern to renters, Bill 23 eliminates the ability of municipalities to implement development charges to fund affordable housing development and services. These funds are a critical component in municipalities' plans to create new affordable homes and support existing housing programs.

6

IMPROVE THE SAFETY AND SECURITY OF SOCIAL ASSISTANCE RECIPIENTS BY ENHANCING THEIR ABILITY TO MEET THE RISING COST OF HOUSING THROUGH INCREASED RATES AND IMPROVED PROGRAM DESIGN OF SOCIAL ASSISTANCE PROGRAMS.

A large majority of Ontario Works and Ontario Disability Support Program recipients live in the private rental market. The shelter allowance portion of social assistance continues to fall dramatically short of the actual cost of housing and so money needed to meet other basic needs must be used to cover the rent.

7

MAKE MEANINGFUL REFORMS TO THE LANDLORD AND TENANT BOARD (LTB) HEARINGS.

Ontarians have voiced their concerns to their local legal clinics, while the Ombudsman's Office, the Ontario Human Rights Commission, the Ontario Bar Association, and other justice sector partners have shared their concerns with how the LTB administers justice in Ontario. These concerns include unprecedented wait times, the creation of barriers for seniors and low-income Ontarians when it moved to a remote service model, and the increased difficulty in accessing local supports with the centralized scheduling model. The LTB has had a 20 year history of providing quality, efficient adjudication. That high standard was achieved by providing regional, in-person services, and offering barrier free access to its many users. The LTB should return to regional scheduling to improve services and increase meaningful access to justice.

It will take determination and coordination across all levels of government to truly address the linked crises of affordability and rental housing. We cannot wait any longer for action, especially on the part of the province, who have the greatest jurisdictional control over housing. If the province so chose, their rapid implementation of our recommendations could make a tangible difference in the lives of Ontario renters, especially those that are the most vulnerable. It is time to chart a new way forward.