

Submission to the House of Commons Finance Committee

2024 Pre-Budget Consultations

February 9, 2024

Submitted by the Advocacy Centre for Tenants Ontario



The Advocacy Centre for Tenants Ontario ([ACTO](#)) is a community legal clinic funded by Legal Aid Ontario. ACTO provides legal services to low-income tenants across Ontario on issues that affect their ability to maintain decent adequate homes for themselves and their families.

We ask the government to make access to secure and [adequate housing](#) is a keystone of this year's federal budget, especially for low-income and vulnerable households, through:

- 1. Develop a dedicated acquisitions fund to retain current affordable housing stock**
- 2. Acknowledge and address the financialization of housing**
- 3. Prioritize dedicated funding and surplus lands for non-profit housing development**
- 4. Increase housing subsidies for tenants**
- 5. Create an Indigenous-governed Urban, Rural and Northern (URN) Indigenous Housing Centre**
- 6. Mechanisms for rights holders**
- 7. Monitoring the implementation of the right to housing**
- 8. Close the gap between social assistance rates and costs of living**
- 9. Addressing enforcement gaps for short term rentals**
- 10. Establish and fund a tenant focused low income efficiency program**

A Critical Moment in a Deepening Affordable Housing Crisis

We are reaching a tipping point in our prolonged and ever worsening housing crisis in Canada, which is disproportionately impacting the country's almost 5 million tenants – 1.7 million of which live in Ontario. A growing number of tenant households do not have incomes keeping pace with accelerating rental costs. As of 2021, 44.9% of tenant households across Canada and 51.9% tenant households in Ontario live in housing that is unacceptable.¹ One in three Canadian renter households pay unaffordable rents, spending 30% or more of their income on shelter.² In Ontario, the percentage is higher, with 38.4% of tenant households in the province spending 30% or more of their income

¹ Statistics Canada. [Table 98-10-0246-01](#) Acceptable housing by tenure: Canada, provinces and territories, census divisions and census subdivisions.

Note: Unacceptable housing means housing that costs more than 30% of income, is in a state of major repair and/or does not have enough bedrooms for household composition. Unlike core housing need, households who have lower incomes than shelter costs as well as students are included, and it is not assumed that households are able to get their housing needs met by moving to another suite within their community.

² Statistics Canada. 2023. (table). Census Profile. 2021 Census of Population. Statistics Canada Catalogue no. [98-316-X2021001](#). Ottawa. Released November 15, 2023.

on shelter; 15% spend 50% or more of their income on shelter, placing them at higher risk of homelessness.³

Housing is a key social determinant of health. This became even more evident during the COVID-19 pandemic. Having safe, adequate, and affordable housing is critical for the post-pandemic recovery. In Ontario, thousands of households have been evicted and/or are being threatened by eviction because of the financial toll of the pandemic and the rapidly escalating cost of living. Rents have continued to sharply increase in 2021, 2022, and 2023. A 2021 [report](#) found that Ontario witnessed the largest increase in average rents (4.8%) with the largest cities, such as Toronto, remaining significantly unaffordable for lower income tenants. The most recent Rental Market Report by CMHC concluded that over the past year “rent growth exceeded average wage growth by a wide margin. Lower-income renters faced below-average vacancy rates for the least expensive units in most cities.”⁴ And nationally, average asking rents reached an all-time high in December 2023 at \$2178.⁵

Across Ontario in 2021:

- The average household income for ~1.7 million tenant households was \$71,700. However, the average household income for the over 650,000 tenant households unable to afford housing was **\$39,920**.⁶
- Annual social assistance rates were even more dire: **\$10,105** for an unattached single person considered employable; **\$15,449** for an unattached single living with a disability; **\$23,777** for a single parent with one child; and **\$32,657** for a couple with two children.⁷
- The minimum rental wage needed⁸ to afford an occupied primary purpose-built rental suite was **\$55,912**⁹ and a vacant rental (primary or secondary suite) was estimated to be **\$81,924**.¹⁰

Based on average rent, as of January 2024 four out of the top five most expensive cities for tenants to live in are in Ontario.¹¹ In Toronto, the second most expensive city to rent in, it is estimated that the minimum income required for a tenant to be able to afford the

³ Statistics Canada. [Table 98-10-0248-01](#) Core housing need by tenure including presence of mortgage payments and subsidized housing: Canada, provinces and territories, census metropolitan areas and census agglomerations.

⁴ Canada Mortgage and Housing Corporation (CMHC). [Rental Market Report – January 2024](#), p.5.

⁵ <https://rentals.ca/national-rent-report>

⁶ Statistics Canada. [Table 98-10-0252-01](#) Shelter-cost-to-income ratio by tenure: Canada, provinces and territories, census metropolitan areas and census agglomerations.

⁷ https://maytree.com/wp-content/uploads/Welfare_in_Canada_2021.pdf

⁸ The average wage needed to afford the average cost of a suite (paying less than 30% of income).

⁹ Canada Mortgage and Housing Corporation (CMHC). Housing Market Information Portal; Primary Rental Market; Ontario — Historical Average Rents by Bedroom Type: <https://www03.cmhc-schl.gc.ca/hmip-pimh/en#TableMapChart/35/2/Ontario>.

¹⁰ <https://rentals.ca/blog/rentals-ca-november-2021-rent-report>

¹¹ <https://rentals.ca/national-rent-report>

average cost of a 1 bedroom vacant primary or secondary rental suite is **\$101,643**, a minimum income of **\$134,068** is required to afford the average cost of a vacant 2 bedroom suite, and at minimum a household income of **\$154,027** is required to afford the average cost of a vacant 3 bedroom suite.¹²

One driver behind this is vacancy decontrol. Landlords can set any price they choose for a vacant unit, so if a tenant moves to a new rental home in Ontario, they will pay substantially more than their previous residence. For tenants facing eviction, it means they will face great difficulties in finding a new place that they can afford in the current rental market. For low and moderate income tenants, there are very few rental options that will not force them to pay unaffordable rents and cut back on other necessities — 60% of tenants in Ontario reported cutting back on food in order to pay shelter costs.¹³

And without ensuring that affordability standards are set through meaningful participation with tenants, programs such as the Rental Construction Financing Initiative have resulted in housing being built that still costs between 45 – 55% of tenant incomes (for households across the largest cities in Canada).¹⁴

Worse yet, without meaningfully addressing our housing crisis we are increasingly seeing the return to downloading a structural and systemic issue onto individuals. There is an alarming focus on migrants and international students wrongfully¹⁵ as the source of our housing crisis.¹⁶ Despite this not being an evidence based conclusion (we do not have statistics disaggregating housing characteristics for post-secondary students) we see federal policy also reflecting these damaging stereotypes.¹⁷ Which only worsens outcomes for already vulnerable populations and deflects away from the real underlying causes and drivers of our housing crisis: financialization, lack of private sector regulation, concurrent lack of investment in non-market housing, and lack of tenant protections. We have also seen many provinces and municipalities increasingly criminalizing homelessness, and along with local police forces, punishing those forced to self resolve by government inaction through encampment evictions and displacements. Which is a double human rights violation.

These trends and the current status quo is unsustainable. It is not too late to make the bold steps necessary to address our grim reality and current housing situation. We make the following recommendations:

1. Develop a dedicated acquisitions fund to retain current affordable housing stock

¹² <https://rentals.ca/national-rent-report>

¹³ <https://www.acto.ca/a-new-poll-shows-the-majority-of-ontario-renters-are-having-to-choose-between-food-and-paying-their-rents-when-it-comes-to-housing-affordability-this-province-is-on-fire/>

¹⁴ <https://monitormag.ca/articles/fact-check-affordable-rental-housing-isnt-affordable/>

¹⁵ <https://www1.thetyee.ca/Analysis/2023/09/21/International-Students-Housing-Crisis-Our-Problem/>

¹⁶ <https://thetyee.ca/Culture/2023/05/03/What-Behind-Housing-Crisis-Canada/>

¹⁷ <https://monitormag.ca/articles/canada-is-cutting-international-student-visas-and-thats-bad-policy/>

For the past 15 years, Ontario has lost more affordable 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.

Between 2006 and 2016, Ontario experienced a 26% decline in units that rent for less than \$1000, while units renting by over \$1,500 increased a shocking 360%. This trend has further accelerated. Between 2016 and 2021, units renting for under \$1,000 have decreased by another 36%. Meanwhile, units renting for over \$1500 have increased by 54%. The highest increase has been in luxury rentals, renting for over \$3000, which have increased by 87%.¹⁸

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 830,000.¹⁹ 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.²⁰ 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.²¹ The Canadian Housing Policy Roundtable (CHPR), calculated that from 2010-2020, an estimated 60,000 affordable units (with monthly rents below \$750, affordable to annual incomes under \$30,000) were lost every year, while the NHS aims to create an average of 16,000 affordable units annually.²² This means that for every one unit of affordable housing created through the NHS, four are lost. Other research calculates that between 2011 and 2016, prior to the National Housing Strategy, the ratio was 1:15, meaning for every one home created with federal assistance, fifteen affordable market homes are lost.²³

Preserving existing affordable housing rental stock through acquisition is less expensive than new construction and less risky, since operating costs are known and there is an existing rental income stream. Acquisition of existing units is also much faster – with CMHC 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 current 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.

¹⁸ Statistics Canada. Table [98-10-0254-01](#) Shelter cost by tenure including presence of mortgage payments and subsidized housing: Canada, provinces and territories and census subdivisions affiliated with First Nations or Indian bands

¹⁹ <https://www.policyalternatives.ca/publications/monitor/our-opportunity-end-housing-poverty>

²⁰ <https://carleton.ca/cure/wp-content/uploads/CURE-Brief-Federal-Budget-2017.pdf>

²¹ <https://www.linkedin.com/pulse/new-census-data-reveals-continuing-issue-erosion-lower-steve-pomeroy/?trackingId=bgne37RkR6CwBe2Sx4%2FgUQ%3D%3D>

²² https://www.chpr-trpcl.ca/files/ugd/d08e4f_ced4187d60614d0289b436c74723b2b1.pdf

²³ <https://www.focus-consult.com/why-canada-needs-a-non-market-rental-acquisition-strategy/>

We join the Canadian Centre for Policy Alternatives, CHRA, and other organizations in calling for a national acquisition program to supplement existing NHS programs. The national acquisitions program would support community housing providers, providing pre-approved CMHC funding and financing to buy existing rental properties and preserve affordability. In addition, CMHC needs to make acquisition of existing rental property eligible under existing programs like NHCF, RCFI and RHI. In Edmonton, Alberta, it has been estimated that almost half of all primary purpose build rental housing is financialized. However, half of older rental stock is not yet held by financialized owners.²⁴ This non-financialized rental stock also needs to be assessed for the 7 criteria of adequate housing, including accessibility (and visitability should also be considered).²⁵ Supporting non-profit housing providers to purchase and renovate existing, older rental stock will prevent further losses and preserve affordability for low- and moderate-income households over the long term.²⁶

2. Acknowledge and address the financialization of housing

One of the rising challenges 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 per cent of the country’s private, purpose-built stock of rental apartments.²⁷ ²⁸ These businesses must by their nature maximize profits and therefore pursue ever-increasing rental income.

This view of housing as a profit-maximizing investment is in direct conflict with the notion of housing as a basic need and human right. The financialization of housing is the main reason for the loss of affordable rental housing, which has seen 15 units lost for every new affordable rental unit created. It has led to detrimental impacts on housing affordability and the ability to find housing for low- and moderate-income renter households.²⁹ As a result, tenants face large rent increases, evictions, and displacement in the landlord’s quest for greater profits.

²⁴ <https://affordablehousingsolutionslab.com/2023/04/28/the-financialization-of-housing-multi-family-rentals-in-edmonton/>

²⁵ <https://www.ohchr.org/en/publications/fact-sheets/fact-sheet-no-21-rev-1-human-right-adequate-housing>

²⁶ [Social Housing and Human Rights Coalition \(SHHR\). Federal Pre-Budget Submission. 2024.](#)

²⁷ <https://policyoptions.irpp.org/magazines/june-2021/the-rise-of-financial-landlords-has-turned-rental-apartments-into-a-vehicle-for-profit/>

²⁸ Estimates in the city of Edmonton are over half of national estimates (48% in 2022).

²⁹ <http://www.focus-consult.com/why-canada-needs-a-non-market-rental-acquisition-strategy/>

Despite the National Housing Council focusing its first ever panel on the financialization of multi-family housing this past year as well as the early warning signs that financialized housing could be fundamentally unstable³⁰:

- Investors and their impacts on our housing market continued to be omitted from CMHC's annual market rental report
- Real estate was exempted from [Bill C-42](#)
- The Canada Pension Plan Investment Board remains invested in financialized housing
- We still lack strong national and local data on the scope and impact of financialized primary as well as secondary rental housing³¹

We need government to commit to addressing the scope and impact of financialization and its harmful impact on housing by 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 targeting money laundering. REITs do not have to pay any corporate income tax; the tax liability is passed on to investors. However, when investors have REITs in a tax-sheltered account, like an RRSP, no one pays any taxes. This tax preference has helped them aggressively expand, which has reduced the supply of affordable housing for ordinary Canadians.

3. Prioritize dedicated funding and surplus lands for non-profit housing development

The greatest housing need in Ontario and across Canada is for purpose-built rental housing that is affordable over the long term. Ontario needs to build at least 10,000 new rental units annually to meet the demand of a growing population. However, we have seen an average of only 5,500 rental completions annually over the period from 1990 to 2020³² – approximately half of what we need.

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 coop housing. A new funding mechanism dedicated to non-profit housing development would revitalize the non-profit and co-operative housing sector, and result in new homes that are permanently affordable. These stable, secure and affordable homes are the type

³⁰ <https://www.cbc.ca/news/canada/north/tim-kiladze-g-a-northview-trust-1.6866494>

³¹ The Canada Mortgage Housing Corporation (CMHC) characterizes rental housing in Canada as a binary of 'Primary' and 'Secondary' rental housing. Primary rental housing is purpose-built for rental. This includes multifamily apartment buildings, and row houses. And only includes rental suites in private structures with at least 3 suites. Secondary rental housing is not purpose-built for the rental market. This includes condominiums used for apartments, semi-detached/freehold row homes, town homes/duplex homes, and accessory apartments (most commonly, secondary suites).

³² CMHC's Housing Market Information Portal, Ontario — Historical Completions by Dwelling Type, 2020, <https://www03.cmhc-schl.gc.ca/hmip-pimh/>

desperately needed in communities across Canada. Furthermore, increasing the number of non-market rental homes would counter the increasing financialization of housing. Investing in the non-profit housing sector will also create new jobs, result in significant gains in economic productivity without inflation,³³ and improve disposable incomes for low-income households as well as social, educational, and health outcomes. We echo the call for action from the Social Housing Human Rights Campaign ([SHHR](#)), seeking at minimum federal investment to create 50,000 new rent-geared-to-income non-market housing suites (less than 30% of household income) per year for 10 years starting with this budget. The government should also examine allocation of National Housing Strategy funding practices to reallocate funding priorities to non-profit housing providers that will keep housing affordable over the long run.

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. The government should also promote innovative models of land ownership, such as the community land trusts model. Community land trusts are local private not-for-profit organizations that purchase land and use it for the benefit of a community. This approach is a way for the government to remove properties from the speculative land market and to allow the non-profit sector to develop affordable housing for middle and low-income families. Public land is a major form of public investment in housing development and should not be used to enrich investors at the expense of low- and moderate-income Canadians.

4. Increase housing subsidies for tenants

An increasing number of renter households find themselves unable to fully pay their monthly rents and have fallen into arrears. Other tenants have paid their rent by taking on large debts, often times at high interest rates, in order to keep a roof over their heads. ACTO's public opinion poll of renter households in Ontario found that 60% of households had cut back on food to pay for housing³⁴. Housing stability initiatives proved critical to combat the spread of COVID-19 and renters who faced income losses during the pandemic should not be in danger of losing their homes or forced into deep levels of debt.

We ask the government to scale up housing supports, such as the Canada Ontario Housing Benefit, that provide direct financial supports to tenant households. The rising cost of living is placing an increasing number of tenant households in a precarious financial position and at greater risk of eviction. While there was an announcement earlier this week of a \$99 million top-up to the Canadian Housing Benefit, it is unclear how these funds will be disseminated and what impact this will have for tenants in Ontario over the long term – especially for those who are not residing in suites under rent control (suites

³³ <https://chra-achru.ca/economic-necessity/>

³⁴ <https://www.acto.ca/a-new-poll-shows-the-majority-of-ontario-renters-are-having-to-choose-between-food-and-paying-their-rents-when-it-comes-to-housing-affordability-this-province-is-on-fire/>

built or first occupied for residential use after November 15, 2018) and considering over the past year “rent growth exceeded average wage growth by a wide margin.”³⁵

5. Create an Indigenous-governed Urban, Rural and Northern (URN) Indigenous Housing Centre

ACTO supports CHRA’s call for the federal government to create a fully funded Indigenous-governed Urban, Rural and Northern (URN) Indigenous Housing Centre to develop and deliver the URN Indigenous Housing Strategy. As a result of colonization and ongoing systemic racism, Indigenous peoples experience unique housing challenges compared to settler populations in Canada. At the present time, these needs are not adequately being met; despite Indigenous peoples making up only 2.8% of Ontario population, they make up 15% of the homeless population in Toronto³⁶ and 55% in Thunder Bay³⁷. A lack of adequate housing is resulting in poorer socio-economic and health outcomes for Indigenous people. To address this issue, the federal government should ensure that future Indigenous housing policies and programs be designed and led by Indigenous representatives that will find appropriate solutions to Indigenous people’s housing needs.

6. Mechanisms for rights holders

Despite the asset of the National Housing Strategy Act in 2019, and the first review the National Housing Council panel undertook on the financialization of multi-family housing last year, we still lack meaningful mechanisms for tenants (when housing rights have been violated/to prevent future infringements on housing rights). Including:

- a. Federal funding of civil legal aid: Last month the Office of the Federal Housing Advocate released a series of reports confirming that evictions in Canada contravene Human Rights Law.³⁸ While eviction should always be a last resort, and tenants have a right to legal council when facing eviction, most tenants do not have access to legal representation.³⁹ This is especially the case for Indigenous people, Black and racialized people, people with disabilities, and households with low-incomes.⁴⁰

³⁵ Canada Mortgage and Housing Corporation (CMHC). [Rental Market Report – January 2024](#), p.5.

³⁶ Peter Menzies, “Aboriginal Homelessness,” *Homeless Hub*, 2010, <https://www.homelesshub.ca/resource/aboriginal-homelessness>

³⁷ Caryl Patrick, “Aboriginal Homelessness in Canada: A Literature Review,” *Homeless Hub*, 2014, <https://www.homelesshub.ca/sites/default/files/AboriginalLiteratureReview.pdf>

³⁸ <https://www.housingchrc.ca/en/new-reports-confirm-that-evictions-in-canada-contravene-human-rights-law>

³⁹ Sarah Buhler, “[The Right to Counsel for Tenants Facing Eviction: Security of Tenure in Canada](#).” 2023.

⁴⁰ <https://www.housingchrc.ca/en/new-reports-confirm-that-evictions-in-canada-contravene-human-rights-law>

In addition there have been countless municipal and/or provincial attempts at evicting encampment residents. In some cases clinics in Hamilton, Waterloo, and Kingston have fought admirably to prevent their cities from evicting their most vulnerable residents. However it is difficult to marshal significant resources in a short period of time, and it is not always possible for a small clinic or a small team of lawyers supported by community donations to challenge each eviction attempt. Further, any wins were only possible because the city sought permission from the Court to remove the residents. Many cities do not bother to seek permission and they evict based on their own bylaws. Municipalities and provinces should have to seek Court permission to evict as a prerequisite for eviction (ie. with the Waterloo and Kingston decisions, the Court played a useful role in ensuring that the city's actions complied with the Charter). And there should be dedicated government funds set aside to ensure tenants and rights holders will have access to legal representation when needed.

- b. We also need to make sure there are dedicated federal funds in place to ensure we are properly [resourcing rights claimants](#) in the development of rights mechanisms. And we join the National Right to Housing Network's (NRHN) call for \$4.5 million to be set aside for a targeted funding program.
- c. [Women's National Housing and Homelessness Network \(WNHHN\) recommendations](#): our housing crisis is also deeply gendered and women and gender-diverse people are placed at increased risk due to lack of safe and available housing choices. We need to make tangible steps to ensure women, gender-diverse, children, and 2SLGBTQQIA people are able to access adequate housing; have housing needs prioritized within capital and infrastructure projects; are a central part of planning processes; housing agencies serving this population have ongoing, flexible and sustainable funding. Which necessitates updating the National Housing Strategy to be reflective of the realities and recommendations from women and gender-diverse people with lived expertise of our housing crisis. We also need investment to ensure First Nations, Métis and Inuit women and gender-diverse people are centered within new housing projects as well as housing strategies.
 - There also needs to be sustainable long-term funding for projects after they are piloted such as ACTO's Your Way Forward program which is a new specialized housing legal service supporting tenant victim-survivors of gender based violence.
- d. Meaningful participation of rights holders in development of new housing
 - Building housing according to [7 criteria of adequate housing](#)
 - All new builds should be accessible and visitable

- CP Planning: [roadmap for redevelopment plans to confront systemic racism](#).
- e. Education for civil servants, elected officials and legal community employed by orders of government on what the right to housing is, that all orders of government are responsible for this, what meaningful participation of rights holders is, along with a timeline on implementation for such programming (which should be created in collaboration with rights holders).
 - f. Bolstering the role of the Federal Housing Advocate: taking up recommendations, monitoring the progressive realization of the right to adequate housing.

7. Monitoring the implementation of the right to housing

There are serious data gaps that remain that make it difficult to assess current policies and programs in terms of their effectiveness with providing access to adequate housing choices for all households across Canada. Including:

- i. Disaggregated housing data from rights holder's perspectives. Including tracking underlying trends (i.e. tenant household debt)
- ii. Gaps with transparency of ownership
- iii. Lacking a baseline measure of the [7 criteria of adequate housing](#) let alone monitoring these measures over time, across various geographical levels

8. Close the gap between social assistance rates and costs of living

As the gap between tenant incomes and rental costs widens, outcomes and realities are even more dire for individuals and households who are recipients of social assistance.⁴¹ While regulation of the private market is essential, social assistance rates need to at least keep pace with market rates rather than consistently being below poverty lines.⁴² Especially as households dealing with low-incomes are the very vulnerable to eviction.⁴³

9. Addressing enforcement gaps for short term rentals

We were pleased with the November 21st announcement of a \$50 million Short-Term Rental Enforcement Fund for municipalities and tax measures to deny income tax deductions for expenses incurred operating short-terms in areas where provinces or

⁴¹ https://maytree.com/wp-content/uploads/Welfare_in_Canada_2022.pdf

⁴² https://maytree.com/wp-content/uploads/Welfare_in_Canada_2022.pdf

⁴³ <https://www.housingchrc.ca/en/new-reports-confirm-that-evictions-in-canada-contravene-human-rights-law>

municipalities have either banned short-term rentals or where short-term rentals are non-compliant. These are welcome and much-needed measures to protect current and future housing stock from being used as dedicated hotel inventory for platforms like Airbnb. Providing additional resources to help municipalities with high illegal commercial short-term rental activity enforce their regulations better will ensure that housing stock is preserved for residential use.

In Toronto, the largest short-term rental market in the country, Municipal Licensing and Standards, the division tasked with enforcing illegal short-term rental activity, has been facing cash and resource constraints. The federal enforcement fund would assist in addressing this issue, and we fully support these measures considering Canada's housing crisis. However, the speed with which the government delivers these measures as well as the efficacy across platforms is of utmost importance. Enforcement has been lagging behind, and bringing units that were planned, approved and built as residential suites – not hotels – back to the housing market is a priority across all of Ontario and Canada.

10. Establish and fund a tenant focused low-income efficiency program⁴⁴

Energy efficiency upgrades should be available to all, including tenants⁴⁵ as well as households living with low-incomes.⁴⁶ Such upgrades lower utility bills, conserve energy, buffer from extreme cold and weather events, as well as improve health and housing outcomes for households currently struggling to get energy needs met. We join Efficiency Canada's call asking for a federal investment of \$2 billion over 4 years to extend reach of energy efficiency programs to all low-income households, permit adequate time to ramp-up capabilities of regional programs already in place, and to facilitate retrofits to 200,000 homes.⁴⁷

⁴⁴ <https://www.energycanada.org/wp-content/uploads/2023/03/Low-income-Sign-on-Letter.pdf>

⁴⁵ https://energycanada.nationbuilder.com/tenant_rights_report_download

⁴⁶ <https://www.energycanada.org/low-income-report/>

⁴⁷ <https://www.energycanada.org/wp-content/uploads/2023/03/Low-income-Sign-on-Letter.pdf>