

January 27, 2026

The Honourable Peter Bethlenfalvy, Minister of Finance  
c/o Budget Secretariat  
Frost Building North  
3rd Floor, 95 Grosvenor Street  
Toronto ON M7A 1Z1

Re: 2026 Budget Consultations

Dear Minister Bethlenfalvy,

I am writing on behalf of the Advocacy Centre for Tenants Ontario (ACTO), a specialty community legal clinic funded by Legal Aid Ontario. ACTO has a provincial mandate to advance and protect the interests of low-income tenants on issues that affect their ability to access and maintain decent homes for themselves and their families.

Ontario's housing crisis disproportionately affects the province's 1.7 million renter households, particularly households living on lower incomes.

- Four in ten renter households in Ontario spend 30% or more of their income on shelter. 15% spend 50% or more of their income on shelter and are at a higher risk of homelessness.<sup>1</sup>
- Based on average asking rents, five of the top ten most expensive Canadian cities for tenants to live in are in Ontario.<sup>2</sup>
- 85,000 Ontarians were homeless in 2025, an over 8% increase from the previous year. Since 2001, homelessness has increased by 49.1%<sup>3</sup>
  - From 2024 to 2025, homelessness in Northern Ontario increased by 37.3%, and has increased by approximately 117.5% since 2001.<sup>4</sup>
- Ontario has an estimated shortage of 60,000 – 100,000 supportive housing suites. Consequently, 27,000 Ontarians on wait lists for supportive housing have wait times as long as 7 years.<sup>5</sup>
- Altogether 184,000 households in Ontario are enrolled in rent-geared-to-income (RGI) housing programs – and an additional 176,804 households are on RGI wait lists – demand is nearly double current supply.<sup>6</sup>
- Between 2020 and 2022, the number of children experiencing poverty in Ontario increased by 46% – the highest growth rate of poverty amongst children of all

provinces across Canada.<sup>7</sup>

Tenants living on low and moderate incomes face uncertain economic times with tariffs, job losses, and inflation increasing their economic vulnerability. These tenants have very few rental options that will not force them to pay unaffordable rents and cut back on other necessities. This is starkly illustrated by the 60% of tenants in Ontario who report cutting back on food to pay shelter costs.<sup>8</sup> Toronto's food banks had over 4.1 million visits in the 2024-2025 year, a 340% increase from 2019. 88% of food bank clients live in unaffordable housing.<sup>9</sup>

For the past 20 years, we have 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 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 accelerated. Between 2016 and 2021, units renting for under \$1,000 decreased by another 36%. The highest increase has been in luxury rentals, renting for over \$3000, which increased by 87%.<sup>10</sup> The ongoing loss of affordable rental units is reflected in the lower vacancy rates for rentals in the bottom quartile of rent. For the Toronto metropolitan area, the vacancy rate for units at the lowest range is 0.7%, compared to a 5.4% vacancy rate for units in the highest rent quartile.<sup>11</sup>

Ontario's housing crisis demands immediate action. We can't afford to wait any longer. We urge the government to adopt the following recommendations.

## Summary of Recommendations

### 1. Prioritize investment in affordable housing

- Invest in the development and acquisition of social housing and non-profit housing.
- Preserve surplus land exclusively for non-profit and public housing projects, while supporting the creation and expansion of community land trusts.

### 2. Repeal Bill 60 and prevent its harmful impacts on tenants

- Repeal Bill 60, which would undermine security of tenure for tenants across the province.
- Commit to consultations with tenants and housing advocates before implementing changes to the Residential Tenancies Act.

### 3. Implement full rent control and improve security of tenure for tenants

- Repeal Section 113 (*Vacancy Decontrol*) of the Residential Tenancies Act, 2006.

- Repeal Sections 6.1 (2), 6.1 (3), 6.1 (4), 6.1 (7) (2018 Exemption) of the Residential Tenancies Act, 2006.
  - Repeal Sections 126 and 127 of the Residential Tenancies Act, 2006.
- 4. Set clear and measurable targets and invest resources needed to end chronic homelessness**
- Make significant, long-term investments to end chronic homelessness and provide housing solutions as viable alternatives to encampments.
  - Develop clear, measurable goals and targets to end chronic homelessness.
  - Develop a provincial encampment protocol to ensure that human rights are upheld.
- 5. Address the Needs of Victim-Survivors of Gender Based Violence (GBV)**
- Reintroduce and adopt Bill 55 (previously Bill 173) to declare GBV an epidemic.
  - Meaningfully engage with GBV victim-survivors, advocates, and stakeholders to develop and implement a comprehensive plan for eliminating GBV in Ontario.
  - Expand housing options by investing in public housing, supportive units, and portable benefits to ensure victim-survivors can access safe, stable homes when leaving shelters.
  - Create a GBV victim-survivors support fund.
  - Allocate funds and resources required to develop a fulsome provincial GBV strategy.
- 6. Make Meaningful Reforms to the Landlord and Tenant Board (LTB)**
- Provide parties a choice to have in-person hearings.
  - Schedule hearings by region to improve wait times and access to justice.
  - Return in-person counter service to the Tribunals Ontario offices.
  - Require the Attorney General of Ontario and Chief Justice of the Ontario Court of Justice to collect and publish comprehensive, disaggregated data tracking rental housing cases from initial LTB application through to the final outcome.
- 7. Increase the Capacity of the Rental Housing Enforcement Unit (RHEU)**
- Provide timely data to address the discrepancy between calls and cases, cases opened and convictions, and maximum penalty enforcement. This up- to-date reporting needs to be publicly available and accessible.
  - Increase the capacity of the RHEU with a fully staffed investigation unit.
  - Create a stronger mandate to prosecute parties with dedicated prosecutors.
- 8. Ensure Access to Justice for Low-Income Ontarians: Adequately Fund Legal Aid Ontario**

- Restore Legal Aid Ontario's budget to its pre-2019 level (adjusted for inflation) to guarantee access to justice and ensure our courts processes run efficiently for people living on low incomes across Ontario.

## **9. Address the Physical and Monetary Costs of our Climate Crisis on Tenants**

- Make amendments to the *Residential Tenancies Act* to enshrine access to cooling in the vital services act.
- Track heat related deaths, similarly to what is being done in British Columbia.
- The Ontario Electricity Support Program (OESP) should account for any increase in costs to tenants from cooling.
- Expand the "Save on Energy - Energy Affordability Program" so that all renter households living in all dwelling types have access to free heat pumps.
- Create a new emergency fund for tenants displaced by climate crises.

## **10. Close Critical Housing Data Gaps**

- Create a centralized system to collect and analyze disaggregated housing data, identifying communities with the greatest housing needs. This system must include a public, searchable beneficial ownership registry to ensure transparency in rental housing ownership.

## **11. Redress Social Assistance**

- Index Ontario Works (OW) to inflation and significantly increase both OW and Ontario Disability Support Program (ODSP) rates.

## Recommendations

We recommend that the Government of Ontario immediately:

### **1) Prioritize Investment in Affordable Housing**

Ontario is the only province or territory in Canada where municipalities are solely responsible for social housing. Ontario is in its third decade of this model and the result has been wait lists almost equivalent to our entire current stock (with decades long wait times), along with the quiet loss of existing social housing.<sup>12</sup> With 184,400 households in Ontario enrolled in rent-geared-to-income (RGI) housing programs, an additional 176,804 households are on RGI wait lists – demand is nearly double the current supply.<sup>13</sup> It is long past time for the province return to its historical role of investing in public housing, especially with the private market falling significantly behind housing start targets.<sup>14</sup>

One of the most effective ways to expand the supply of affordable housing is to invest in the development of public housing, non-profit, and co-op housing. Social housing, when properly resourced for capital and operating costs, has a proven track record of providing affordable housing in perpetuity for Ontarians. These stable, secure, and affordable homes are the type desperately needed in communities across Ontario. New market supply does not provide affordable rents – particularly for households living on low- and moderate-incomes.

Furthermore, increasing the number of social housing suites through either acquisition or new builds will counter the escalating financialization of housing. Investing in the non-profit housing sector will also create jobs, increase disposable income for renters, and improve social, educational, and health outcomes for our neighbourhoods and communities. To achieve the OECD standard proportion of community housing, Ontario needs to build or acquire at least 143,225 new suites by 2030 – a 43% increase in current stock.<sup>15</sup> Creating these additional homes would boost productivity between 5.8% - 9.5%, which would be comparable to a \$43 - \$70 billion boost to GDP.<sup>16</sup>

The provincial government should use surplus land and properties for the development of affordable housing by leasing or selling the properties below-market value to non-profit developers. Doing so will guarantee these housing developments will be affordable in perpetuity. The province 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 one way for the government to remove properties from the speculative market

and to allow the non-profit sector to develop affordable housing for lower income Ontarians.

We urge you to follow this advice. We also encourage implementation of the seven recommendations made by United Way Greater Toronto for creating affordable and deeply affordable housing in Ontario.<sup>17</sup> We ask that you continue to support the community-housing sector as represented by the Ontario Non-profit Housing Association and the Co-operative Housing Federation of Canada (Ontario Region).

### **Recommendations:**

- Invest in the development and acquisition of social housing and non-profit housing by building or acquiring at least 143,225 new suites by 2030.
- Ensure surplus land is preserved and only provided to non-profit and/or public housing projects, while supporting the creation and expansion of community land trusts.

### **2) Repeal Bill 60 and prevent its harmful impacts on tenants**

Tenants across Ontario are experiencing economic uncertainty and financial pressures. The government should strengthen security of tenure and housing stability. The recently enacted Bill 60, Fighting Delays, Building Faster Act, 2025 instead undermines tenant protections and threatens housing stability across the province. The reforms enacted by Bill 60 jeopardize the right to housing, leaving tenants with fewer tools and time to advocate against unfair evictions and displacement.

Bill 60 undermines tenant protection and stability of tenure by:

- reducing the time to pay back rent to avoid an eviction hearing to only 7 days.
- Shortening the time to appeal LTB decisions from 30 days to just 15 days.
- Placing financial barriers on tenants before they can raise issues like disrepairs or safety concerns during their arrears hearing.
- Eliminating the one month rent compensation for “landlord own use” (N12) evictions if the landlord provides 4 months notice.

These provisions make it easier for financialized landlords to evict tenants and exploit rent control loopholes to re-rent units at much higher rents. Ontarians losing their jobs due to tariffs and groups covered by the Ontario Human Rights Code will be at greatest risk of eviction, while denied access to justice at the LTB. The LTB is one of the busiest tribunals in Ontario’s justice system, receiving over 90,000 applications for hearings annually and has been unable to manage its workload since the implementation of the virtual-only hearing system. Moreover, tenants have been denied fair hearings due to

significant technological, accessibility, and procedural barriers. Bill 60 will result in a greater number of eviction filings, increase pressure on the LTB and add to the persistent backlog.

We urge the Ontario government to engage in meaningful consultation with tenants, housing advocates, and community organizations before advancing policies that affect the lives of tens of thousands of Ontarians.

### **Recommendations:**

- Repeal Bill 60, which undermines security of tenure tenants across the province.
- Consult with tenants and housing advocates before developing regulations that can have detrimental impacts on housing stability for thousands of Ontarians.

### **3) Implement full rent control and improve security of tenure for tenants**

At this moment of economic uncertainty, implementing comprehensive rent control would create stability for renters and strengthen rent control.

Vacancy decontrol, in place since 1998, allows landlords to set unlimited rents for new tenants in vacant units. This policy has steadily eroded affordable housing, as evidenced by the dramatic decline in affordable rentals and surge in luxury units over the past 15 years.<sup>18</sup> In fact, new renters in Ontario pay an additional 19% in rent (an average of \$320/month) compared with ongoing tenants.<sup>19</sup> Vacancy decontrol traps tenants in their current homes by making moves unaffordable, while giving landlords a powerful incentive to push out their long-term tenants. From 2020 to 2023, there was an 85% increase in landlord own-use applications in Ontario.<sup>20</sup>

The 2018 exemption to rent control was meant to address the housing affordability crisis by encouraging rental development. Recently built rentals have failed to make a dent on the housing affordability crisis. These units are exempt from rent control and are much more expensive than older rentals.<sup>21</sup> In 2025, the average rent for newly built 2-bedroom rentals in the Toronto GTA was \$3,086, compared to an average rent of \$2,034. In Ottawa, average rent for new 2-bedroom units was \$2,669, compared to average rent of \$1,926. In London, average rent of new units was \$2,431 compared to average rent of \$1,651. In Windsor, average rent for new units was \$2,329 compared to average of \$1,454.<sup>22</sup>

The 2018 exemption encourages developers to demolish older, affordable buildings and replace them with luxury units, forcing out long-term residents and destroying affordable housing stock.<sup>23</sup> In 2022, the LTB processed over 5500 demoviction applications, a 41%

increase over three years.<sup>24</sup> Right now in Toronto, more than 10,000 residents may face demoviction across 100 at-risk buildings. These families may endure forced relocation and unexpected financial burdens. Moving costs alone are estimated to be between \$1879-\$4320 for a bachelor or one bedroom suite and \$2507-\$5361 for a two bedroom.<sup>25</sup>

Introduced in 1992 and modified in 2006, landlords with rent-controlled suites can apply to the LTB for above guideline increases (AGIs) to download costs onto their tenants. Capped at a rate of 3% per year for three years (in addition to regular allowable annual increases), rationale for AGIs can include renovations (but not maintenance), new security measures, and property tax increases. Despite the intent for AGIs to expire when costs have been recouped, there is no mechanism to end them. Therefore, tenants most often continue paying higher rents indefinitely. Given that landlords are already legally required to maintain their properties, AGIs can perversely reward neglect. Most small landlords treat maintenance as a normal business expense and operate without AGIs, proving these increases aren't necessary for building upkeep.<sup>26</sup> However, large and often financialized landlords identify AGIs as a major revenue stream. For example, between January to August 2022, 50% of all 470 AGI applications were filed by only 20 landlords. Tellingly, of the top five (who filed 25% of AGI applications alone), four were financialized firms.

As a result of AGIs, tenants pay tens of thousands of dollars in substantially higher rents over time. The impact is longstanding, far beyond the three years an AGI would be in place for a renovation.

Total Additional rent paid due to AGI*:			
Timeline:	Starting rent: \$1000	Starting rent: \$2000	Starting rent: \$3000
3 years	\$2,277	\$4,554	\$6,831
5 years	\$4,702	\$9,404	\$14,105
10 years	\$11,314	\$22,629	\$33,943
15 years	\$18,796	\$37,592	\$56,388

\* AGI (Above Guideline Increase): 3% per year for 3 years

### *Immediate Benefits*

The solution to these issues is clear and cost-free: Ontario must implement full rent control by eliminating these three exemptions. Research confirms that modern rent control policies do not discourage new rental construction, making this a straightforward way to protect tenants.<sup>27</sup>

Removing vacancy decontrol would protect all of Ontario's 1.7 million renter households in the private market.<sup>28</sup> Renters could freely choose where to live as their needs change, without being limited by unaffordable rents. Eliminating vacancy decontrol



would reduce fraudulent "own-use" evictions and renovictions by removing the profit motive to push out existing tenants.

Scrapping the 2018 exemption would preserve landlords' ability to set initial rents at market rates for new buildings but prevent unlimited increases afterwards. Removing the 2018 exemption would ensure new rental construction improves rather than worsens the affordability crisis. This change would also likely reduce demovictions and protect tenants from displacement.

Given that the legislative obligation to maintain a good standard of repair already exists, removing AGIs would protect renters from having to choose between unaffordable rent hikes and living in well-maintained units. In the case where landlords wish to upgrade their buildings to be environmentally sustainable, instead of unfairly downloading these costs onto tenants, the Government of Ontario should work with additional orders of government to ensure that low-cost loans or subsidies be made available, in return for clear expectations and regulations ensuring affordability.

### **Recommendation:**

The Government of Ontario needs to implement full rent control. This can be done quickly, easily, and inexpensively by making the following changes to the Residential Tenancies Act, 2006, S.O. 2006, c. 17:

- Repealing Section 113 (Vacancy Decontrol)
- Repealing Sections 6.1 (2), 6.1 (3), 6.1 (4), 6.1 (7) (2018 Exemption)
- Repealing Sections 126 and 127 (Above Guideline Increases)

## **4. Set clear and measurable targets and invest resources needed to end chronic homelessness**

One of the outcomes of our prolonged housing crisis is that more and more Ontarians continue to be pushed into homelessness. Almost 85,000 Ontarians experienced homelessness in 2025, an increase of 49% from 2021 to 2025. Without intervention this number could more than triple by 2035, leaving up to 294,000 people without stable housing.<sup>29</sup>

Employment alone does not prevent homelessness or poverty. Work must be accompanied with stable housing and services for people to keep long-term employment. We recommend that the province set clear measurable goals to reduce and ultimately end homelessness in Ontario. Evidence shows that people are more successful in moving

forward with their lives if they are first housed. This is as true for people experiencing homelessness and those with mental health and addiction issues as it is for anyone. Instead of focusing primarily on emergency responses, the government must direct its energy and resources towards long-term solutions. A commitment to end chronic homelessness requires realistic, short-, medium- and long-term targets, and the resources needed to implement it.

To end chronic homelessness, the province will need to invest resources to build capacity and implement policy solutions that help increase the number of affordable (and deeply affordable) housing units in Ontario. The Association of Municipalities of Ontario released a report in 2025 calling for an investment of \$11 billion over 10 years to end chronic homelessness.<sup>30</sup> These investments would fund the development of new housing infrastructure including subsidized housing, supportive housing and transitional housing, as well as eviction prevention through early intervention and rent assistance.

Supportive housing is critical to reducing chronic homelessness, enabling individuals to achieve housing stability while receiving the supports they need. Ontario has an estimated shortage of 60,000 – 100,000 supportive housing suites. Consequently, 27,000 Ontarians on wait lists for supportive housing have wait times as long as 7 years.<sup>31</sup> Investments in supportive housing have proven to be an effective use of public dollars. For every \$10 spent on housing and supports for those who are chronically homeless, \$21.72 is saved in costs related to health care, the justice system, shelters, and other social supports.<sup>32</sup> We recommend that the Government of Ontario designate at least 40,000 suites of new community housing stock as supportive housing to house our most vulnerable residents. We support the call from Addictions and Mental Health Ontario (AMHO) to fund the development of at least 1,000 new mental health and addictions supportive housing units in 2026/27 as part of a commitment to get Ontario on track to open 36,000 new units by 2035.<sup>33</sup>

In addition, we recommend the government improve inter-Ministerial policy and funding coordination within the Government of Ontario and across the three levels of government. The province needs to centralize resources, decision-makers and staff, and streamline efforts around ending chronic homelessness.

### *Enshrine a Rights-Based Approach to Encampments*

Without sufficient mechanisms to prevent homelessness, and lacking adequate housing choices, individuals and households are forced to resort to encampments. This means Ontarians living in encampments should be treated with dignity and not be criminalized nor discriminated against. As of 2023, a minimum of 1,400 encampments were in existence across the province (including anywhere from 1 to upwards of 100 residents).<sup>34</sup>

Any decisions municipalities make regarding encampments need to be in consideration of the perspectives of people living in encampments, who need to be part of these decision-making processes and should be provided legal and any other additional supports required. Those living in encampments should have all basic needs met (i.e. safe drinking water, sanitation/waste management, social/healthcare services, personal safety, fire and food safety, harm reduction and pest prevention/management). As well, governments are obliged to respect self-determination of Indigenous encampment residents and consultation must take place to ensure consent before any actions that would impact residents are taken. To prevent human rights violations, residents cannot be removed from encampments without meaningful consultation, without legal supports, and without adequate housing options. In the case where all alternatives are exhausted and, if relocation is necessary, residents must be provided with long-term adequate housing solutions.<sup>37 38</sup>

### **Recommendations:**

- Make significant, long-term investments to create more than 75,000 new affordable units<sup>35</sup> to end chronic homelessness and provide housing solutions as viable alternatives to encampments
- Develop clear, measurable goals and targets to end chronic homelessness
- Develop a provincial encampment protocol to ensure that human rights are upheld

## **5) Address the needs of victim-survivors of gender-based violence (GBV)**

We cannot afford any further delay on recognizing intimate partner violence (IPV) across Ontario as an epidemic<sup>a</sup>. Advocates have called for this essential first step towards eradicating gender-based violence (GBV) for decades.

Bill 55 (originally Bill 173) needs to be immediately reintroduced and adopted. Doing so would provide a clear statement from the government that survivors' right to housing should be protected and enhanced. This would provide further relief for low-income survivors facing the compounding challenges of the housing affordability crisis.

The government took an important step forward in November by calling IPV endemic and acknowledging the prevalence and pervasiveness of IPV. However, this framing falls short of identifying the critical and escalating nature of violence across the

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<sup>a</sup> Utilizing results from a recent research project to identify barriers that victim-survivors of gender based violence face when trying to obtain and stabilize housing, ACTO is currently piloting a provincial program to address these gaps. This program is supported and funded by the Department of Justice, where over the next three years ACTO and eight partner clinics will develop and provide legal education, advice, representation, and holistic services for victim-survivors. These recommendations are directly informed by this work.

province, and the need for the targeted responses that a declaration of epidemic would facilitate.

Once enshrined into law, recognizing GBV as an epidemic has the potential to strengthen survivors' access to justice, prevent secondary victimization through the legal system, and improve housing stability. More specifically, legal professionals could incorporate the epidemic of GBV into eviction prevention and advocacy efforts to ensure that renters experiencing IPV are not held responsible for the actions of the perpetrator and evicted into a housing crisis. Like the Gladue principles, which require criminal courts to consider the over-representation of Indigenous people in the criminal system, adjudicators would be compelled to consider the housing realities of survivors and reduce the number of survivors who are over-represented in the homelessness population.

Following this, for real impact for victim-survivors of GBV, the province needs to significantly reinvest public funds back into housing.

Firstly, public reinvestment is necessary to expanding access to social housing, which will also increase safety for those trying to exit situations of GBV and attain housing stability. Following the provincial cuts from 1995, transitional housing remains without core funding and is entirely reliant on grants. Transitional housing has been described by victim-survivors as a lifeline, as it allows extra time after leaving the shelter system to find stable and permanent housing, while providing access to additional specialized supportive services. The expansion of current funds could also address the discrepancy between the length of shelter stay (whether emergency or transitional shelter) and the time it takes to receive a subsidized housing offer through Special Priority housing — ensuring clients are not evicted into precarious housing while awaiting permanent housing.

Most victim-survivors are only able to afford social housing, and many need additional supports to remain stably housed. Therefore, social and supportive housing choices need to be readily available for households in housing need, especially GBV victim-survivors. At present, many are on long wait lists and may qualify for COHB for private rental market housing before a vacancy in non-market housing opens up. The current practice of diverting households from social housing waiting lists into private market housing with COHB is not effective. The COHB subsidy is capped and has not kept pace with the actual costs of private market rental housing. Unless there is a renewal of the COHB agreement (which is set to expire in 2028) the future of this program, and those that depend on it, are seriously at risk.

The costs associated with moving act as a major barrier to stabilizing housing as this restricts a victim-survivor's ability to leave and can force them to remain in unsafe situations for longer periods of time. The province needs to create a GBV victim-survivors' support fund, to cover first and last month's rent, rental damages, storage fees, moving costs, utility cancellation/hook-up fees, as well as hotel stays for victim-survivors unable to access shelters.

Finally, resources and funds are necessary to develop a provincial GBV strategy. While the Ministry of Children, Community and Social Services (MCSS) has developed an Anti-Human Trafficking strategy, this does not include a broad-based GBV strategy. A provincial GBV strategy that expands beyond the criminal context will enhance the province's ability to address and prevent GBV, allocate funding where needed, and contribute towards the federal government's National Action Plan to End Gender-Based Violence.

### **Recommendations:**

- Reintroduce and adopt Bill 55 (previously Bill 173).
- Meaningfully engage with victim-survivors, long time advocates and key stakeholders to begin planning the next steps for implementation to eradicate GBV in Ontario.
- Reinvest in public housing, supportive housing, and the portable housing benefit so that housing choices are readily available, safety is assured and those exiting GBV can access housing stability.
- Create a GBV victim-survivors' support fund to cover first and last month's rent, rental damages, storage fees, moving costs, utility cancellation/hook-up fees, as well as hotel stays for victim-survivors unable to access shelters.
- Provide the necessary funds and resources required to develop a fulsome provincial GBV strategy.
- Increase funding for the Canada-Ontario Housing Benefit.

## **6) Make Meaningful Reforms to the Landlord and Tenant Board (LTB)**

Ontarians have voiced their concerns to their local legal clinics, the Ombudsman's Office, the Ontario Human Rights Commission, the Ontario Bar Association and other justice sector partners with how the LTB administers justice in Ontario. These concerns include unprecedented wait times and the creation of additional barriers for Ontarians when it moved to a remote service model.

Research confirms that many Ontarians face significant barriers when required to participate in day-long digital LTB hearings to defend their housing rights. Technological barriers, disproportionately impacting households living with low-incomes, are well documented.<sup>36</sup> The lack of uptake of in-person filings through Service Ontario cannot be attributed to electronic preference without examining barriers to access – especially in consideration of Service Ontario disruptions (including unexpected closures) and the Staples partnership (including underestimated costs and unknown service improvement outcomes for Ontarians).<sup>37</sup>

The remote hearing model has also unnecessarily lengthened hearing blocks due to confusion from parties at the start of the hearings. As well, there are more disputes that proceed to merit hearings compared to the in-person hearing process. Simultaneously, the proportion of applications resolved through mediation continues to plummet. Where possible, mediation typically occurs on the same day of a scheduled hearing and is a more favorable and timely process for both landlords as well as tenants. The inefficiency of removing in-person services is set out in the LTB's annual report on its backlog. Before in-person services were removed in 2020, 14.2% of 82,095 applications were resolved through mediation and the backlog was 22,803.<sup>38</sup> Four years later, the backlog ballooned to 53,030 cases (only a decrease of 27 cases from the previous annual report) while only 6% of applications were cleared through mediation.<sup>39</sup>

The data about the productivity and efficiency of adjudicators reflects another problem. The LTB's 2024-25 Annual Report indicates that 108,146 applications were resolved. Of these, only 47% or 50,828 were resolved following a hearing. This means that the average case resolution following a hearing for the 133 adjudicators was 382.1 applications per adjudicator. In 2018-19, when there were 51 adjudicators, 79,476 applications were resolved. 61% or 48,480, were resolved following a hearing, for an average of 950 applications per adjudicator.<sup>40</sup>

The current system is not working. An overwhelming backlog leads to rushed dismissals, mounting rental arrears, and persistent technical problems. The LTB must reinstate in-person hearings to ensure options are available to accommodate all stakeholders – a recommendation also echoed by the Toronto Regional Real Estate Board (TRREB) and the Ontario Real Estate Association (OREA).<sup>41</sup> Bill 60 will not improve the LTB or result in improvements for landlords because it only adds more applications to the system and will further burden the backlog by reducing the waiting period for filing L1 applications.

In addition, implementing minimum arrears thresholds would also reduce the current backlog by preventing frivolous applications from clogging the queue. At present, the

minimum amount required for an eviction application is a mere \$5 dollars. We recommend adjusting this minimum amount to reflect one month of rent. Specifically, \$1000 for suites built or first occupied for residential purposes before November 15, 2018 and \$2000 for suites built or first occupied for residential purposes after November 15, 2018.

The LTB had a long history of providing quality, efficient adjudication before it moved to a remote service model. That high standard was achieved by providing regional in-person services and barrier free access to its many users.

To ensure we course correct to improve access to justice for renters, the Attorney General of Ontario and the Chief Justice of the Ontario Court of justice must mandate the collection and reporting of more clear and timely data specific to tracking the housing circumstances and real outcomes of renters, including LTB application data. We need disaggregated data by geography and notice (i.e. L2 applications disaggregated by N12 and N13 notices). We also need this same level of data disaggregation for the actual outcomes of each application (which would still be a level that preserves the privacy of tenants). This should include the adjudicator's decision or order (i.e. whether in favor of the applicant or respondent). It should also track the number of eviction orders filed with the Sherriff (Court Enforcement Office), as well as the number of enforced evictions carried out (including whether the former tenant has alternative housing). We also need a mechanism to ensure the resolution of time limited orders and data collection to reflect this (i.e. expiration of AGIs).

All of the above should be publicly and freely available and released on a timely schedule.

### **Recommendations:**

- Providing parties a choice to have an in-person hearing.
- Schedule hearings regionally so that multiple applications for the same address are not scheduled across hearing blocks. Scheduling provincially by matter is wasteful and leads to delays that create an inefficient dispute resolution process.
- Return in-person counter service to the Tribunals Ontario offices to reduce the backlog of cases.
- Increase minimum arrears necessary to file an application: \$1000 for suites built/first occupied for residential purposes before November 15, 2018 and \$2000 for suites built post November 15, 2018.
- The Attorney General of Ontario and The Chief Justice of the Ontario Court of Justice must collect and share timely and disaggregated data to track underlying

trends, renter outcomes and housing challenges, from an LTB application through to the final outcomes.

## **7) Increase the capacity of the Rental Housing Enforcement Unit (RHEU)**

The RHEU is responsible for enforcing over 50 offenses under the RTA, monitoring compliance with offences, investigating cases of alleged failure to comply, and prosecuting alleged offenders where warranted.

The LTB traditionally serves as the primary forum for tenants and landlords to enforce their rights, with the RHEU providing supplementary support when parties cannot access the LTB process. Extensive hearing delays at the LTB have dramatically increased demands on the RHEU for intervention. The RHEU's responses typically consist of encouraging voluntary compliance, with minimal investigations, and rarely, prosecution referrals. These limitations, combined with the LTB's extensive delays, have created an environment where some parties disregard their responsibilities under the RTA with impunity.

On average, the RHEU receives around 18,400 calls per year and 1,500 cases are opened. Of this, only 200 (13%) of cases go to the investigation stage and less than 1% of cases result in convictions through the Ontario Court of Justice.<sup>42</sup>

Between 2022 to 2023, out of 16,394 calls, 1,452 (9%) were resolved through the “compliance stage”.<sup>43</sup> During this period, only 219 cases (1% of all calls) resulted in investigations, leading to just 21 prosecutions and 17 convictions.<sup>44</sup>

The RHEU requires a fully staffed investigation unit and dedicated prosecutors to effectively enforce rental housing laws. Following other provinces' successful models, an expanded RHEU mandate would play a crucial role in stabilizing Ontario's housing crisis. For example, in British Columbia the government is increasing the Residential Tenancy Branch's (RTB) operating budget and staffing by 40%, including doubling the size of the Compliance and Enforcement Unit (CEU).<sup>45</sup> The CEU serves a similar function to the RHEU, investigating complaints and taking action on repeat or serious residential tenancy offences, and if necessary, levying monetary penalties.

An increase in the resources available for investigations and prosecutions would lead to more timely enforcement of the RTA and ensure that parties are abiding by their legal responsibilities.

## **Recommendations:**



- Provide timely data to address the discrepancy between calls and cases, cases opened and convictions and maximum penalty enforcement. This reporting needs to be publicly available and accessible.
- Increase the capacity of the RHEU with a fully staffed investigation unit.
- Create a stronger mandate to prosecute parties with dedicated prosecutors.

## **8) Ensure Access to Justice for Low-Income Ontarians: Adequately Fund Legal Aid Ontario**

The 2019 provincial budget included a 30% reduction of Ontario's contribution to Legal Aid Ontario (LAO). This reduction has had a long lasting impact on its services for Ontarians. Ontarians rely on a strong legal aid system to ensure there is access to justice for our most vulnerable residents. With fewer resources, courts and tribunals slow to a halt because there are more self-represented parties.

The lack of legal aid funding creates severe barriers at tribunals like the LTB and Social Benefits Tribunal. Many individuals cannot effectively present their cases or even attend hearings without representation, lacking both advocacy skills and financial resources. When basic shelter and income supports hang in the balance, the societal costs are substantial. This crisis disproportionately affects certain populations that are socially and materially disadvantaged, including: households living on low-incomes, seniors, people with disabilities, women, and children.

Besides greater efficiency in the legal system, legal aid investment also produces economic, social, and health benefits for society and those using the system. Research has demonstrated that for every \$1 invested on legal aid there is a saving of \$9 to \$16 in justice services and programs.<sup>46</sup> The budget of LAO should be restored to at least its pre-2019 level to guarantee access to justice and ensure our courts processes run efficiently for residents across Ontario.

### **Recommendation:**

- Restore Legal Aid Ontario's budget to at least its pre-2019 level (adjusted to inflation) to guarantee access to justice and ensure our courts processes run efficiently for people living on low incomes across Ontario.

## **9) Address the Physical and Monetary Costs of our Climate Crisis on Tenants<sup>47</sup>**

According to the RTA, renters need to have uninterrupted access to vital services but cooling and air conditioning are not included in the RTA regulations. There is currently

no legal standard to protect the health of vulnerable tenants. We call on the province to make amendments to the RTA to enshrine access to cooling in the vital services act. In addition, we need to better track heat related deaths, similarly to what is being done in British Columbia.<sup>48</sup>

Targeted federal and provincial programs should be created to assist landlords with meeting these new cooling requirements. Provincial and federal funding for energy retrofit programs should explicitly include building upgrades to provide cooling. Currently, there are several programs available to assist the owners of large buildings with energy retrofits. Those programs should be widened and targeted to low-income rental properties. The programs should explicitly include funding for retrofits to allow for cooling as a critical climate adaptation measure.

The Ontario Electricity Support Program (OESP) should account for any increase in costs to tenants from cooling. The OESP on-bill credit amounts need to be increased to reflect any higher electricity usage to adequately cool dwelling units during the summer months.

We are pleased that the ongoing “Save on Energy – Energy Affordability Program” is continuing to provide free heat pumps to qualifying households. We recommend that this program be expanded to include all renter households, living in all building types (only those living in detached, semi-detached, duplex, triplex, townhouse or social housing buildings under three stories can currently apply) as well as renter households that currently rely on natural gas, propane, oil and wood as energy sources.<sup>49</sup>

Ontario should also create a new emergency fund for tenants displaced by climate crisis, whether it occurs temporarily during mandatory evaluations or long-term when residents lose their homes and communities. Finally, the government should establish a summer disconnection ban so that people don’t die in their homes during extreme heat events.

These recommendations account for the worsening climate crisis and the disproportionate impact of stressors and extreme heat on vulnerable populations including the elderly, those with chronic illnesses and mobility challenges, and those that are socially and materially disadvantaged. In addition, we support the recommendations put forward in the budget submission by the Low Income Energy Network (LIEN).

## **Recommendations:**

- Make amendments to the Residential Tenancies Act to enshrine access to cooling within vital services.
- Track heat related deaths, similarly to what is being done in British Columbia.
- The Ontario Electricity Support Program (OESP) should account for any increase in costs to tenants from cooling.
- Expand the “Save on Energy – Energy Affordability Program” so that all renter households living in all dwelling types have access to free heat pumps.
- Create a new emergency fund for tenants displaced by climate crises.

## **10) Close Critical Housing Data Gaps**

Progress on housing outcomes is often stymied by significant data gaps on critical topics such as formal and informal evictions (and what notices tenants receive), stock of affordable rental units, and rent levels. We need a centralized system that collects disaggregated data to identify and support communities most affected by housing needs.

Ontario still lacks a public, searchable beneficial ownership registry that would expose regulatory gaps by revealing who actually owns both purpose-built and secondary rental properties.

### **Recommendation:**

- Create a centralized system that collects disaggregated data and uses timely data to identify and support communities most affected by housing needs, including a publicly available and searchable beneficial ownership registry.

## **11) Redress Social Assistance**

A large majority of OW and ODSP 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, forcing recipients to rely on the basic needs portion to pay rent. However, we have not heard of any commitment from this government to address this recognized shortcoming despite social assistance rates being \$200 a month less now than rates were in 1995.<sup>50</sup> This, despite rates of homelessness of social assistance recipients having doubled over the last two years.<sup>51</sup>

The 2026 budget must contain measures that increase assistance to keep pace with market costs as current maximum rates cannot cover costs of housing, let alone other essential needs.<sup>52</sup> The government should index Ontario Works (OW) to inflation and significantly increase both OW and Ontario Disability Support Program (ODSP) rates,

so they rise above the poverty line with a binding commitment to cut the OW/ODSP poverty gap by at least 50% by 2030.

Additionally, the OW earnings exemption should be raised to at least \$1,000 per month, the ODSP clawback on earnings above the exemption should be reduced to 50%, and the \$1,000 exemption should be extended to non-disabled spouses. This way, OW recipients will be able to transition more realistically between social assistance and employment. This change will protect households from sliding deeper into poverty when an ODSP recipient earns additional income or when their non-disabled partner works full-time.

Lastly, the government should implement an equitable flat-rate structure to social assistance programs. There are many who are prevented from receiving the shelter allowance, especially those who need it the most. Including those without a fixed address, living in RGI suites, and those living in board and lodging settings.<sup>53</sup>

For more details on how to fix our social assistance rates, we refer to our joint [submission](#) with ISAC on Ontario's New Five-Year Poverty Reduction Strategy.

**Recommendations:**

- Index social assistance rates to inflation and significantly increase rates.
- Increase the monthly exemption earnings for OW recipients and spouses of ODSP recipients to \$1000.

A thriving economy and prosperous future for Ontario depends on ensuring everyone has access to safe, secure housing.

Thank you for your consideration of our submission.

Yours very truly,

**Advocacy Centre for Tenants Ontario**

per:



Douglas Kwan  
Director of Advocacy and Legal Services

c.c. Honourable Rob Flack, Minister of Municipal Affairs and Housing

c.c. Honourable Doug Downey, Attorney General for Ontario  
c.c. Jessica Bell, Critic, Finance  
c.c. Jeff Burch, Critic, Municipal Affairs  
c.c. Catherine McKenney, Critic, Housing  
c.c. Kristyn Wong-Tam, Critic, Attorney General

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