



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

January 24, 2022

Councillor Gary Crawford
Chair of the Budget Committee
City of Toronto
10th Floor, West Tower, City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Dear Members of the Budget Committee,

Re: 2022 Capital and Operating Budgets

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

As we emerge from the pandemic, Toronto remains in an affordable rental housing and homelessness crisis. This is reflected, for example, in the struggles the City's shelter system faces in providing safe spaces for our city's most vulnerable. As evidence, deaths of shelter residents quintupled from 26 in 2018 to 132 tragic cases in 2021. Point in Time Counts also reveal that individuals from racialized, Indigenous, and LGBTQI2S communities are overrepresented among those experiencing homelessness.

Chronic shortages in affordable housing options are the root cause of this problem. Long waitlists for social housing units persist. In fact, it is not just the City's most vulnerable, but a large cross-section of the population living on low to moderate incomes that have limited housing options to choose from. With vacancy rates low - particularly in purpose-built rentals - and rising rents that risk displacing many residents, households are hard-pressed to find suitable options that can be called a home for the long term.

For many low-income households, available housing options are also often poorly maintained and unsafe. A [recent report](#) by the Right to Housing Toronto coalition sketches out how a disproportionate number of low-income residents face chronic problems associated with maintenance and repairs and articulates the need for more proactive measures to enhance the integrity of these buildings.

We acknowledge that the City has recognized the housing crisis and illustrated its systemic and complex nature in its HousingTO 2020 -2030 Action Plan. Indeed, the City's commitment to realizing the right to adequate housing, as stated in its Housing Charter, is commendable. Yet, we remain concerned about the extent to which such aspirations are reflected in the City's budget commitments.

While we are sensitive to the fiscal constraints the City faces, and the crucial role that higher orders of government play in housing, we urge the City to utilize its available financial resources with a focus on housing. We also recommend that a rights and equity-based lens is applied when making financial commitments.

Some notable interventions can make a significant difference:

- First, more enforcement officers must be hired to make the RentSafeTO program work more effectively to maintain property standards across the City. Current efforts to refine the program through redesigning the program's evaluation tool will only have a limited impact if there aren't enough officers available to make use of such tools.
- Second, more City resources should be dedicated to eviction prevention. Programs such as EPIC have been evaluated to show how the wrap around services on offer have proved to be effective at stabilizing housing for Toronto's most vulnerable tenant population. Grants available through Toronto Rent Bank provide an added buffer. During a time when housing precarity persists, such initiatives remain critical.

We also encourage the City to continue to invest in maintaining its social housing stock and keep finding creative ways to partner with non-profit housing providers and make use of precious publicly owned land to ramp up affordable housing developments.

Thank you for considering our recommendations. We welcome the opportunity to provide our housing expertise and look forward to further discussions with the City to ensure Torontonians can live in safe, adequate and affordable homes.

Sincerely,



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