

July 17, 2024

**The Honourable Sean Fraser, P.C., M.P.**

Minister of Housing, Infrastructure and Communities  
House of Commons  
Ottawa, ON  
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**Re: Recommended Principles and Scope for the Renters' Bill of Rights**

Dear Minister,

I am writing to you on behalf of the Canadian Centre for Housing Rights (CCHR) to thank your office for consulting with CCHR on the development of the Renters' Bill of Rights. We want to again emphasize the importance of ensuring the Renters' Bill of Rights provides robust protections that advance the right to housing and reflect the reality of renter experiences during this unprecedented housing crisis.

Renters across the country are facing soaring rental costs, few affordable options, and limited housing security. Renters are increasingly facing housing precarity and homelessness due to a lack of adequate protections against excessive rents, unnecessary evictions, renovations, disrepair, discrimination, and many other issues. Current provincial and territorial [renter protection laws](#) are a patchwork and vary significantly between jurisdictions. Having worked on renters' rights for over 30 years, CCHR has long advocated for national standards that ensure a minimum level of protection for all renters across Canada, no matter where they live. Not only would this help preserve affordability and provide greater security for renters, but it would also help mitigate the ongoing loss of existing affordable homes when renters are evicted and displaced.

We have greatly appreciated the opportunity to have initial discussions with your office and with Housing, Infrastructure and Communities Canada to support the development of the Renters' Bill of Rights. We wish to share our initial feedback on the scope of rights and protections that would be required to ensure that the Renters' Bill of Rights is comprehensive and impactful, based on our discussions with other renter-serving organizations and experts. However, we also wish to reiterate the importance of engaging directly with renter communities to ensure that the Renters' Bill of Rights truly addresses the needs of renters and reflects their voices.

## Principles

To ensure the Renters' Bill of Rights provides robust protections for renters across the country, its development and implementation should align with the following principles:

### Taking a human rights-based approach

A meaningful Renters' Bill of Rights must align with the Government of Canada's commitment to [implement the right to adequate housing](#), as outlined in the *National Housing Strategy Act* and reflecting international human rights law. This commitment also extends to provincial, territorial, and municipal levels of government, all of which are bound by Canada's international human rights commitments. It similarly recognizes the role that housing providers must play in upholding the right to adequate housing for renters.

To create an equitable, fair rental system across the country, the Renters' Bill of Rights must be complemented with concurrent actions and investments that recognize housing as a human right, rather than an investment vehicle, including by prioritizing and growing the supply of non-market, community housing and [tackling the financialization of housing](#).

### Ensuring enforcement and accountability

Some provincial and territorial residential tenancy and human rights legislation already provide many of the renter protections that should be included in a Renters' Bill of Rights (outlined below). However, without robust enforcement and accountability mechanisms (including sufficient resourcing), renters do not benefit from those protections in practice.

A meaningful Renters' Bill of Rights should include enforcement and accountability mechanisms to hold all levels of government and housing providers accountable to uphold renters' right to housing. This should include directing and maximizing public funding to support those in greatest housing need and providing strong access to justice mechanisms that recognize the inherent power imbalance between renters and landlords.

### Protecting all renters

All renters must be afforded equal protections under a Renters' Bill of Rights, regardless of where they live, their tenancy status, or the type of rental housing that they occupy. However, there may be some specific circumstances requiring carve outs for some of the rights listed below.

## Scope

Building on these core principles, we have developed an initial list of minimum standards that would form the necessary foundation for a meaningful Renters' Bill of Rights, reflecting the [elements of adequate housing](#) and the realities that renters face across the country:

- **Right to an affordable rent:**
  - Rents should be regulated based on reasonable financial returns.
  - Rent increases should be moderate and predictable.
  - An “affordable rent” should be clearly defined, i.e., as a rental amount that does not interfere with renters’ other human rights and reflects household incomes rather than market forces.
- **Right to protection against unnecessary, unfair, and/or unilateral eviction:**
  - Eviction should be treated as a [last resort](#).
  - [Proportionality](#) should be applied in eviction decisions.
- **Right to return after redevelopment:**
  - Renters should have access to adequate relocation and/or assistance.
  - Renters should have the right of first refusal to return to their rental unit at the same rent.
- **Right to continuing tenancies** (i.e., no fixed term leases).
- **Right of renters to sublet and assign their rental unit to another renter.**
- **Right of renters to have guests and roommates.**
- **Right to timely repairs and maintenance.**
- **Right of renters to privacy and quiet enjoyment in their rental unit.**
- **Right to services:**
  - Rental units should be serviced by facilities and infrastructure (i.e., drinking water, sanitation, heating/cooling, etc.).
- **Right to clear, accessible legal information and supports** (i.e., access to rental information, legal advice, system navigation, etc.).
- **Right to transparency in rent pricing and landlord information** (i.e., rental registry).
- **Right to accommodations/adaptations for accessibility and cultural adequacy.**
- **Right to equal treatment in accessing and maintaining housing** (i.e., freedom from discrimination).
- **Right to legal counsel.**
- **Right to effective, procedurally fair dispute resolution.**
- **Right to effective, timely enforcement of rights.**
- **Right to a landlord that knows the law** (i.e., training).
- **Right to organize and collectively bargain without penalty.**

A Renters’ Bill of Rights has great potential to move the dial in a meaningful way on upholding renters’ right to housing if implemented thoughtfully. Over the coming months, CCHR will continue to engage with renter communities across the country to gather their feedback and validate these standards. We will also continue our work modelling and demonstrating how these rights can be implemented and operationalized by governments and housing providers.

We remain available to you as you move this work forward and look forward to ongoing opportunities to collaborate with your office and Housing, Infrastructure and Communities Canada to ensure everyone – no matter which province or territory they live in – has an accessible, affordable and adequate place to call home.

Yours sincerely,



Annie Hodgins  
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[Canadian Centre for Housing Rights](http://www.housingrightscanada.com)

CC:  
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