



# PROPERTY STANDARDS AND TENANT SUPPORT

Report to London City Council and the Community  
and Protective Services Committee

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LIFE\*SPIN

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Dear Members of Council and the Protective Services Committee,

The Tenant Support Fair took place on March 22nd, 2024, at City Hall. More than 100 attendees were recorded at the first-ever event of its kind, highlighting tenants' urgent needs. Tenants are living in unsafe conditions, among pests, disrepair and more. Among the tenants that these issues affect are the elderly, the frail, people with disabilities, single parents, children, and many others. With more and more people being pushed into poverty due to rising costs of living and rent prices, it is important that tenants, especially those who are surviving on low-incomes, are given the support they need to advocate for their safety and quality of life in our city. Tenants who are low-income earners are especially susceptible to falling victim to unequal power relationships, between themselves and their landlords. This power dynamic unfortunately leads to tenants being too afraid to speak up about their unsafe living conditions, and feeling like they have no agency or voice in these matters.

Agencies that helped organize the event or shared information at City Hall, include LIFE\*SPIN, London Property Management Association, Mission Services of London, Neighbourhood Legal Services, London Fire Prevention, Housing Stability Bank, Life Stabilization, Coordinated Access Centre, Canadian Centre for Housing Rights, London Hydro, Ontario Disability Support Program, London MPPs, London Property Standards, LUSO Community Services, and London ACORN. The cooperation between London's community organizations showcased a shared understanding and recognition of the severity of current issues that London's tenants are dealing with.

Moving forward, to try and address the layers and complexities of the issues for London's tenants, LIFE\*SPIN is proposing four policy recommendations for Council consideration and implementation. First, we recommend that the City of London coordinate and

fund an annual Tenant Support Fair, with the same vision as the inaugural one. Second, we recommend funding be returned to VHA Home HealthCare and its Extreme Clean program to maintain a vital social service. Next, we recommend that the Property Standards By-law be strengthened and improved to increase its enforceability and clarity. Finally, we recommend that the City of London develop a public extermination department. This would systemically address pest and vermin problems by ensuring oversight and resolution of persistent infestations, particularly within London and Middlesex Community Housing (LMCH).

**Background:**

At the Tenant Support Fair, a frequently reported problem is the presence of vermin and pests, such as cockroaches and bedbugs, within rental units or buildings. There is no clear path of support from the City of London or the London Middlesex Health Unit to assist tenants, particularly the elderly and those with physical barriers. Tenants reported that despite multiple attempts to try and get rid of vermin and pest problems in buildings where they live, the issue persists, as treatment is not done with appropriate support to the tenants. In addition to problems reported regarding pests, these inspection requests included multiple reports of mold, a lack of accessible fire exits, heating/cooling issues, and broken essential elements to a home, such as a sink, toilet, tub, or washer/dryer. Many tenants also expressed how difficult it is to navigate the path to report their concerns, to the City of London Property Standards By-law enforcement. The online service portal for this, is not accessible through the general City of London search tool. Rather, it takes eight separate clicks from the main City of London webpage on different drop-down options to reach the link. We are aware that the Landlord Tenant Task Force has requested clearer access for more than a year. Tenants without any direction or previous experience

navigating this, find it overwhelming and confusing. This information must be made accessible to those who need the service most.

**Recommendations:**

*Recommendation 1:*

Firstly, we recommend that the City of London adopt, coordinate, and host the annual Tenant Support Fair. Business Case #P-25 – Proactive Municipal Compliance recognizes the need for an approach that opens the door for more tenants to speak up about their unit conditions.<sup>1</sup> Under this business case, one of the calendar year’s scheduled blitzes could be set aside for By-law Enforcement and Property Standards to host a Tenant Support Fair at London’s City Hall. Having this once a year, along with the targeted approach of undertaking building blitzes, will offer a well-rounded initiative to inform London’s tenants of their options. The City of London supports safe rental housing through licensing, inspections and enforcement of applicable bylaws, but this could be enhanced through community outreach and tenant support. The City of London will then be able to ensure more transparency within the Property Standards inspection process, increased cooperation and relationship building between landlords, tenants, and the City of London. Organizational items for the event will gladly be made available from LIFE\*SPIN.

*Recommendation 2:*

The Council’s decision to halt funding to VHA Home Health Care and the Extreme Clean program in the adoption of the 2024-2027 multi-year budget is leaving people unable to properly prepare their units for vermin and pest treatment. Investing money into treatment, without

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1. “2024 to 2027 Multi-Year Budget, Adopted March 1, 2024,” City of London, 2024, <https://london.ca/sites/default/files/2024-05/2024-2027%20Multi-Year%20Budget.pdf>.

supporting the preparation of units for frail and disabled tenants, ensures no return on this expenditure. Vermin are covered in the Property Standards by-law and at-risk tenants absolutely require preparation support, as vermin, by definition, are extremely hard to eradicate. Additionally, tenants with Senile Squalor Syndrome and Diogenes Syndrome are acutely at risk of eviction without the critical support, offered with compassion, that has been provided through the Extreme Clean Program.

This is a program that offers support like no other community service in London and the surrounding area. While the Business Case for VHA referred specifically to “hoarding”, the issue of vermin affects other special-risk individuals, including persons suffering from debilitating illnesses, the aged, infirm and physically incapacitated, who cannot physically prepare their homes for exterminating vermin. Not only should the Extreme Clean Program have been continued as a vital service, it should have been expanded to assist all tenants in these special risk categories. This expansion could help address the common infestations in at least three senior’s buildings that are managed by LMCH and owned by the City of London. A majority of residents in these senior’s buildings require extermination preparation assistance. Seniors living within community housing in Huron Heights were interviewed by CBC News. Their insights highlight the challenges of preparing a unit for pest treatment without help, “a program like this would be a lot of help because I can’t lift my TV up and move it or the couch, I’m lucky if I can get myself out of bed”.<sup>2</sup>

The conditions that support the spread of vermin also create health risks to those who are living in these homes, and to all others in the area or building. In cases where Diogenes and

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2. Jim Rider, quoted by Isha Bhargava in, “Seniors left helpless after pest control prep program ends,” CBC News, 2024, <https://www.cbc.ca/news/canada/london/seniors-left-helpless-after-pest-control-prep-program-ends-1.7155017>

Senile Squalor Syndromes lead to hoarding, there is an increased risk of house fires, negative health implications, and, if not dealt with, can lead to homelessness.<sup>3</sup> The Senile Squalor research from 2000, started to investigate compassionate ways to address these protocols for the vulnerable. However, the research and recommendations to Council have all but disappeared from decision making. At minimum, the research and funding support for the Senile Squalor Program should be reinstated and the VHA Program should be funded to continue the intervention program, until comprehensive policies and programs are developed by the City of London.

Considering the lasting social and financial impacts of removing a service such as the Extreme Clean Program, it is critical that funding must be returned to VHA and Extreme Clean to protect Londoners. We are aware that Hoarding/Extreme Clean program will conclude on Friday, August 30, 2024. After this date, Coordinated Access will no longer be taking referrals, abandoning those who are in need of this program. It is ineffective and not cost-friendly to have to pay for extermination that does not work over and over again, because special-risk tenants cannot prepare their units for proper treatment. This issue continues to dramatically compound, as more people are not able to receive the help they need to prepare their units for proper extermination practices, allowing for the vermin to spread. We recommend that Business Case #P-15- Hoarding/Extreme Clean Program be reconsidered when the City readopts the budget, as the need for the program is evident.

*Recommendation 3:*

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3. Daryl Newcombe, “Program to Combat Extreme Hoarding Could Be on Budget Chopping Block,” CTV News, 2024, <https://london.ctvnews.ca/program-to-combat-extreme-hoarding-could-be-on-budget-chopping-block-1.6731080>.

Adequate funding to London Middlesex Health Unit for Senior Squalor and vermin research, as mentioned in Recommendation 2, may set a new course in the future of ensuring that London can uphold all components of the Property Standards By-law – CP 24. London’s Property Standards By-law CP-24 needs to be strengthened. One improvement is the addition of the requirement to seal the entry points between units, such as in Toronto, Barrie, and Waterloo’s Property Standards By-laws. Under Waterloo’s Property Standards By-law, 9.10 Pest Prevention, 9.10.2 states that “openings and holes in a building containing rental units, including chimneys, windows, doors, vents, holes for pipes and electrical fixtures, cracks and floor drains that might permit the entry of rodents, vermin, insects, birds or other pests shall be screened or sealed as appropriate.”<sup>4</sup> Further, defining what an infestation is should also be included in London’s Property Standards By-law under section 4.10.1. This is done in the City of Hamilton’s Property Standards By-law, where it is stated that “an ‘infestation’ includes the presence of one rat or mouse, and in the case of bed bugs, fleas wasps, hornets, ants or cockroaches means the presence of more than one such insect, and in the case of wasps or hornets includes the presence of any occupied nest inside or attached to the exterior of a building, structure or other erection.”<sup>5</sup> To maximize transparency of the By-law enforcement process for tenants, landlords, and property owners, there needs to be an addition of an Enforcement section. This should outline the protocols and systems of: Powers of entry, Orders, Appeals, Failure to comply with an order, Enforcement, and Offences and penalties to the Property Standards By-law.

*Recommendation 4:*

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4. City of Waterloo, By-law No. 2011-122, as of November 07, 2011. Property Standards By-law. 2023 at 9.10.2.

5. City of Hamilton, Consolidated By-law No. 10-221, Property Standards By-law (amended August 2021), at 26(3).

Not only can the Property Standards By-law be strengthened, but the City of London may take a more proactive approach in our community housing buildings. Rather than fund private corporations to piece together treatment and support services, there is an opportunity for envisioning better housing; we ask you to consider that the City of London implement a city-run vermin control service. Since pest and vermin problems are such a persistent issue within London, it is time we view it as a public health threat, and address it as such. The results of the reports filed at the Tenant Support Fair yielded a high level of vermin infestations, such as bedbugs and cockroaches, particularly within low-income or social housing units, including London-Middlesex Community Housing. Vermin infestations of a person's home have been proven to significantly and negatively impact one's mental health, confidence, and quality of life.<sup>6</sup>

As such, as a responsible municipality, the City of London needs to consider implementing a publicly run and operated extermination service for our community housing properties. Currently, units throughout London are being treated with thousands of dollars from property management companies, including the City of London. All without producing proper results or resolutions. It is impossible for frail, disabled, and senior tenants to properly prepare and receive the treatment they need within a short time period. The non-systemic approach led by privately run and operated pest-control companies, does not consider the abilities and circumstances of the tenant. This approach ensures treatment failure. It is time that the City of London begins to view vermin infestations as a public health and property standards matter.

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6. Daniel Schneider, "They're Back: Municipal Responses to the Resurgence of Bed Bug Infestations," *Journal of the American Planning Association* 85, no.2 (2019): 97. <https://doi.org/10.1080/01944363.2019.1591294>.



Implementing a publically run vermin control service that considers the systemic causes of vermin spread, can include further proactive steps be taken. An example of this, is making dryers free to those living in a multi-unit LMCH residential building, who are undergoing extermination treatment. This is important, as it will allow for more low-income tenants to properly follow the bed bug extermination preparation tips given to them, without worrying about the added cost to tenants struggling in poverty. By creating a more systemic approach to vermin control, there will be more success in treatments, considering the situations of every individual. The publically run pest control service will also allow for more transparency in the action steps taken to resolve these persistent issues and help to quell the spread of vermin across the City of London.

Other municipalities have taken steps towards enforcing their by-laws in a manner like this, such as the City of Hamilton. Within City Housing Hamilton (CHH), they have an internal pest control team that is qualified to identify and treat pest infestations within their housing units. This internal team makes the treatment process much quicker for residents.<sup>7</sup> Implementing a public extermination service like this in London would create a clear path to enable the City of London Extermination team to carry out their duties. This would include receiving calls and tracking reports of pests, providing educational material, and setting up units/building inspections. As a pilot project, the Extermination Team could offer services to low-income Londoners, the frail, disabled, and social housing residents. Keeping track of the extermination visits within rental properties in London, will help to ensure the proper steps are being taken to resolve the issue of spreading vermin. Systemic treatment considerations, such as sealing between units, is critical for successful extermination and stopping the spread of vermin.

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7. “Pest Control – City Housing Hamilton Request,” City of Hamilton, 2024, <https://www.hamilton.ca/people-programs/cityhousing-hamilton/tenants/pest-control-cityhousing-hamilton-request>.

**Conclusion:**

At LIFE\*SPIN, we recognize that poverty and its effects are systemic, and must be treated as such. The reality for low-income tenants, is that they face many barriers that prevent them from being able to reach their goals and desired quality of life. The continued abandonment of funding to people in vulnerable positions is a disservice to all Londoners. These policy recommendations aim to address some of the systemic issues affecting low-income tenants. An annual Tenant Support Fair provides a space and place for education and self-advocacy, VHA Extreme Clean is a crucial resource for low-income people to prevent further precarity and potential homelessness, strengthening the Property Standards By-law – CP 24, and implementing a public extermination service will ensure that measures are taken to improve the living conditions of London’s low-income and social housing units (LMCH). As more and more Londoners fall into poverty, we respectfully request that the City of London website path to Report a Concern with your Rental Unit or Building be made clear. In addition, these policy recommendations should be taken into thoughtful consideration to protect those who need it most.

LIFE\*SPIN, 2024

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