

## Report to Community and Protective Services Committee

**To:** Chair and Members  
Community and Protective Services Committee

**From:** Scott Mathers, MPA, P.Eng.  
Deputy City Manager, Housing and Community Growth

**Subject:** Renovictions: Rental Unit Repair Licensing Program One Year Update

**Date:** April 13, 2026

## Recommendation

That, on the recommendation of the Deputy City Manager, Housing and Community Growth, the following actions be taken:

- a) the attached proposed by-law amendments (Appendix "A") **BE INTRODUCED** at the April 28, 2026, meeting of Municipal Council, to amend By-law No. L.-131-16, Schedule 23 - Rental Unit Repair Licence;
- b) that the Mayor and City Clerk **BE REQUESTED** to send a letter on behalf of Council to the Chair of Tribunals Ontario requesting:
  - quarterly reporting of N13 and N12 application volumes for London, disaggregated by application type, geographic area, building size, and outcome; and,
    - i. timely Freedom of Information responses to municipal requests for eviction data needed to support program evaluation;
  - Civic Administration **BE DIRECTED** to continue monitoring N13 application volumes, tenant return rates, and RTA compensation compliance, and report back to the Community and Protective Services Committee in one year (Q1 2027) with updated data and analysis;

**IT BEING NOTED** that the Licence Manager will update the Tenant Information Package with detailed information about RTA Section 54 compensation requirements, calculation methods, and warning signs of informal settlement tactics.

## Executive Summary

On March 1, 2025, the City of London implemented Schedule 23 of the Business Licensing By-law, requiring landlords to obtain a Rental Unit Repair Licence when issuing an N13 Notice to tenants ending their tenancy for extensive renovations. After one year of operation, Civic Administration is making recommendations to strengthen the by-law, improve education and outreach, and increase data sharing.

Lack of data in relation to the number of N13 notices issued in prior years presented a major hurdle in evaluating the effectiveness of the by-law in reducing unlawful evictions. Establishing a process whereby staff receive current records of N12 and N13 filings from the Chair of Tribunals will be a meaningful step in advancing informed program evaluation.

This report also recommends amendments to strengthen Schedule 23 of the by-law and increase tenant support. The proposed amendments focus on two areas: requiring landlords to demonstrate RTA compliance through sworn affidavits before licence issuance and changing the Licence validation period from 180 days to one year

Additionally, the Licence Manager will be making improvements to the Tenant Information Package to address informal pressure tactics and provide clear compensation calculation guidance. These updates will maintain London's information-

based approach to education while improving outreach and resources for tenants facing bad-faith renovations.

## Linkage to the Corporate Strategic Plan

The Rental Unit Repair Licence program advances the Housing and Homelessness Strategic Area of Focus by demonstrating leadership and building partnerships to increase the quality and affordability of rental housing as well as providing support for those facing eviction. The Rental Unit Repair Licence program helps keep individuals and families housed by protecting them from displacement through bad-faith renovation evictions.

The proposed improvements also align with the Wellbeing and Safety Strategic Area of Focus by ensuring tenants understand their rights and have access to information about compensation requirements. By requiring verification of RTA compliance, the proposed amendments will help to keep London affordable by ensuring displaced tenants receive the financial protections to which they are entitled under provincial law.

## Analysis

### 1.0 Background Information

#### 1.1 Previous Reports and Resolutions Related to this Matter

- [Community & Protective Services Committee - March 18, 2024 - Renovictions - Initial Research Report](#)
- [Community & Protective Services Committee - June 10, 2024 - Renovictions: Renovation License and Relocation By-law Changes](#)
- [Community & Protective Services Committee - September 9, 2024 - Renovictions: Amendments to the Business Licensing By-law to Introduce a Rental Unit Repair Licence](#)

#### 1.2 Context

The Rental Unit Repair Licence By-law came into effect on March 1, 2025. The by-law was developed following a review of approaches used in Hamilton and the British Columbia municipalities of New Westminster and Burnaby. In developing London's approach, consideration was given to measures such as compensation and alternate accommodation requirements. Factors including the low vacancy rate and resulting difficulty in securing temporary accommodation as well as the existing compensation requirements under the Residential Tenancies Act were contemplated. As a result, the City's framework focused on proactive education and process transparency.

#### 1.3 Residential Tenancies Act (RTA) 2006

The *Residential Tenancies Act, 2006* (RTA) is the provincial law in Ontario that governs the rights and responsibilities of landlords and tenants, including when and how a tenancy may legally be terminated. Under the RTA, there are several core eviction notices that a landlord must select from to serve on a tenant if they want to end their tenancy. The two that have historically been most misused resulting in bad-faith evictions are N12s (eviction for the landlord's own use) and N13s. A Form N13 is the required Notice a landlord must give to terminate a tenancy when they intend to demolish, convert, or perform extensive repairs or renovations requiring the unit to be vacant. There are several clearly defined obligations that must be met by the landlord to ensure they comply with the legislation. Included amongst the requirements are compensation or comparable accommodation considerations and the requirement to offer the tenant the right of first refusal at the existing lease rate. London's by-law only pertains to N13 Notice's issued under Section 50(1)(C) of the RTA- eviction for renovation or repair.

## 1.4 Provincial Legislation

Provincial Bill 97 (*Helping Homebuyers, Protecting Tenants Act, 2023*) proposed amendments to the RTA (and other legislation) aimed at strengthening tenant protections, including requiring a professional report confirming that renovations require vacant possession and doubling fines for bad-faith evictions. However, as of March 2026, the provisions in the Act that amend the RTA have yet to come into effect.

## 2.0 Discussion and Considerations

Since the Rental Unit Repair Licence By-law came into effect on March 1, 2025, the City has received 7 applications and, through these applications, is aware of seven (7) issued N13 notices to end tenancy for reason of renovation in London. Throughout the first full year of implementation, Civic Administration has closely monitored uptake of the by-law to assess its effectiveness. This work has included efforts to obtain and analyze current eviction data, consultations with municipal counterparts in Toronto and Hamilton to understand their approaches and program uptake, and engagement through the Landlord and Tenant Forum, including discussions with representatives from ACORN, other tenant advocacy groups, tenants, and landlords. Staff have also monitored licenced renovations occurring in London during the first year to identify trends, operational challenges, and compliance outcomes.

At first glance, receiving only 7 applications may suggest that fewer N13 renovations are occurring in London. One possible conclusion is that the new application process may be deterring landlords from proceeding in bad-faith. However, given the limitations of the N13 data currently available in Ontario, it is not possible to draw firm conclusions about the program's effect on renovation activity at this time. Anecdotally, staff have received a small number of calls from tenants and landlords with questions about the by-law however, there have been no investigations conducted in relation to an unlicensed renovation occurring during the first year of the by-law. There have been formal complaints in relation to attempted bad-faith evictions related to N13s issued for reason of demolition or conversion however these were referred to tenant advocacy groups for assistance with contesting the eviction application in front of the Landlord and Tenant Board.

The following section provides further detail on the challenges of assessing current rates of bad-faith renovation evictions in Ontario, which makes it difficult to evaluate the overall effectiveness of municipal renovation programs. However, Civic Administration has engaged with advocacy partners and based on this feedback and analysis of the available data, has identified targeted improvements, including updates to the Tenant Information Package and recommended amendments to the by-law to enhance clarity, effectiveness, and tenant protection outcomes.

### 2.1 Data Analysis and Limitations

Having access to accurate and up-to-date data on N13 Notice filings in London is crucial to understanding and reducing the occurrence of bad-faith renovation evictions in London. Civic Administration has made repeated attempts through Request for Records to obtain data on N13 Notices in London from Tribunals Ontario, which obtains the data from the Tribunals Ontario Landlord and Tenant Board. So far these Request for Records have been unsuccessful and counterparts in other Ontario municipalities have expressed having similar experiences.

This represents a gap in the City's ability to assess program effectiveness. A primary improvement for the City in addressing the issue is to establish a data-sharing relationship with the Landlord Tenant Board. As such, Civic Administration is requesting that Municipal Council write a letter to the Chair of Tribunals Ontario requesting;

- quarterly reporting of N13 and N12 application volumes for London, disaggregated by application type (N13 reason: renovation, demolition, or conversion; N12), geographic location (postal code or ward), building size (number of units affected), and outcome (granted, denied, withdrawn, settled); and,

- timely Freedom of Information responses to municipal requests for eviction data, recognizing that municipalities with tenant protection by-laws require current data for program evaluation.

Although limited, it is still possible to examine the impact of the Rental Unit Repair Licence program by comparing the number of Licenses issued since the by-law's enactment, and comparing it to 2017-2022 data obtained from *ACORN Canada's Ontario Renoviction Report 2024* which is the most current aggregation of N13 filing data for Ontario Municipalities.

**Table 1:** N13 Filings: According to ACORN Canada's Ontario Renoviction Report

Year	Number of N13 Filings
2017	15
2018	11
2019	15
2020	15
2021	40
2022	45

From March 1, 2025, to March 1, 2026, the City of London received seven (7) Rental Unit Repair Licence applications, all for a single multi-unit residential property undergoing extensive renovations. A licence was issued for each, though, most certainly, more N13s were issued for reasons of demolition or conversion. It should be noted that the Rental Unit Repair Licence program only pertains to N13 Notice's issued under Section 50(1)(C) of the RTA and so that is the quantitative data staff had to rely upon.

While this is potential evidence that the Rental Unit Repair Licence program has been effective in reducing renovation related evictions, more complete and current data would allow for a better analysis of the program's effect on N13 filing trends in London.

## 2.2 Comparative Analysis of Renoviction By-laws in Ontario

A small number of municipalities in Ontario have introduced by-laws that go beyond provincial requirements to address tenant displacement resulting from major renovations. These approaches are designed to strengthen tenant protections and support the preservation of affordable housing by placing additional obligations on landlords undertaking significant renovation work.

In Toronto, the municipality has implemented a licensing framework that requires landlords to secure approval prior to undertaking renovations that displace tenants. The by-law emphasizes financial accountability, including compensation for displaced tenants, support for temporary relocation, and mechanisms to address rent increases during the renovation period. It also incorporates administrative controls such as defined licence terms, compliance tools, and public transparency measures.

Similarly, Hamilton has adopted a by-law that requires landlords to either provide comparable temporary accommodation or financial compensation to tenants during renovation periods. The framework establishes expectations around maintaining housing stability for affected tenants, while also including administrative processes that allow for exemptions in certain circumstances.

London's [Rental Unit Repair By-law](#) differs from both Toronto and Hamilton in that it does not mandate landlord-funded compensation beyond what is already required by the RTA. This approach was deliberate, reflecting Council's September 2024 decision to focus on proactive education and transparency rather than creating new compensation requirements or exemption processes that would increase administrative burden and require additional staff resources.

Based on staff's review and discussions with municipal counterparts, no jurisdiction is currently positioned to determine effectiveness, and continued monitoring will be required before any conclusions can be drawn.

In fact, since each municipality enacted its by-law, general uptake has been similar. The City of Toronto has had 6 applications since the by-law came into force on July 31, 2025, and the City of Hamilton has had 7 applications since their by-law came into force on January 1, 2025.

Overall, these municipal approaches reflect a more proactive and interventionist model aimed at mitigating the impacts of renovation-related evictions through a by-law. However, such frameworks remain uncommon. Across Ontario, and more broadly in Canada, few municipalities have implemented comparable by-laws, with most continuing to rely primarily on provincial legislation to govern landlord and tenant relationships.

See Appendix B for a table summary of London, Toronto, and Hamilton's Renovation Eviction By-laws.

### **3.0 Recommendations and Implementation**

#### **3.1 Tenant Information Package**

Civic Administration has maintained ongoing dialogue with tenant advocacy organizations including *Neighbourhood Legal Services London and Middlesex* and *ACORN Canada*. These organizations have expressed concerns about landlord tactics that may occur outside the formal licensing process. Of particular concern are informal settlement arrangements where landlords may offer tenants one-time payments in exchange for vacating immediately and waiving their right-of-first refusal. These informal settlement arrangements are commonly referred to as "Cash for Keys" offers. Such offers are also not tracked and therefore do not show up in official data.

London's Tenant Information Package explains the Rental Unit Repair Licence process, defines key terms, outlines the right-of-first refusal, and provides information about the RTA's Section 54 compensation requirements. The package also includes contact information for external support agencies including *Neighbourhood Legal Services London and Middlesex*, *ACORN Canada*, and other community organizations.

While the current Tenant Information Package does explain that compensation may be required under the RTA, it does not provide detailed calculation methods or specific dollar amount examples. The package appropriately clarifies that compensation is "not part of the Rental Unit Repair Licence process and is not something that the City of London can assist with," reinforcing that this is a provincial matter under the jurisdiction of the Residential Tenancies Act.

Feedback from tenant advocacy organizations indicates that the current Tenant Information Package, while helpful, does not adequately address the specific tactics that landlords may use to pressure tenants into waiving their rights. Therefore, the Licence Manager will be updating the Tenant Information Package to include:

- Detailed explanation of Section 54 of the RTA compensation requirements, with specific dollar amount examples based on unit size and building type;
- Clear guidance on how to calculate compensation amounts, including step-by-step examples;
- Warning signs of informal settlement tactics, including the fact that accepting payments may require waiving the right to return;
- Clear statement that tenants are not required to accept any settlement offer and have the right to maintain their right of first refusal;
- Updated contact information for free legal resources, community legal clinics, and tenant advocacy organizations that can provide advice;
- Step-by-step explanation of the Landlord and Tenant Board process if tenants wish to dispute an eviction or claim compensation.

Civic Administration will continue to work with *Neighbourhood Legal Services London and Middlesex*, *ACORN Canada*, and other tenant advocacy organizations to develop

updated content that addresses the specific concerns that have been identified through their work with affected tenants.

## **3.2 Recommended By-law Amendments**

Based on what has been learned during the first year of the Rental Unit Repair Licence program, Civic Administration is recommending two key changes to Schedule 23 of the Business Licensing By-law.

### **3.2.1 Section 54 Compliance**

A gap in the current by-law is the absence of any mechanism to verify that landlords are fulfilling their compensation obligations under the RTA Section 54. While the RTA requires compensation in certain circumstances, there is no enforcement mechanism at the provincial level, and the municipal licensing process currently does not verify compliance.

As such, Civic Administration is recommending an amendment to Schedule 23 of the Business Licensing By-law (the Rental Unit Repair Licence program) requiring a sworn affidavit that the tenant has been appropriately compensated in accordance with Section 54 of the RTA. This proposed amendment would not create new compensation requirements or impose costs on the City, rather it would require landlords to document their compliance with existing provincial law as a condition of holding a municipal licence. The requirement for an affidavit creates accountability and potential penalties under the Criminal Code for providing false information and is intended to be a stronger deterrent than unsigned declarations.

### **3.2.2 Extended Licence Term**

London's current 180-day licence term is shorter than both Toronto's (12 months) and Hamilton's (12 months or completion, whichever is earlier). The September 2024 report justified the shorter term based on alignment with Building Code Act provisions regarding commencement of construction and RTA provisions regarding reasonableness of displacement periods.

However, the current licence term may not be sufficient if the tenant does not vacate after the required 120-day notice period and the landlord has to go to the Tribunal, requiring the landlord to pay a renewal fee before the renovations can lawfully commence. This may inadvertently incentivize Landlords to begin renovations before they are permitted. The requirement to renew the Licence every 180-days also creates administrative burden for both landlords and city staff without providing a clear benefit to tenants.

Civic Administration recommends extending the licence term to one year, matching both Toronto's and Hamilton's licence term. This approach would reduce administrative burden while maintaining accountability through the renewal process for projects extending beyond one year. The renewal provisions in Sections 4.2 and 4.3 of the Rental Unit Repair Licence By-law, which require evidence of why renovations are not complete, are intended to provide safeguards against indefinite displacement.

See Appendix A for the full By-law Amendment.

### **3.2.3 Implementation**

If Council approves the proposed amendments to Schedule 23 of the Business Licensing By-law L.-131-16, Civic Administration will undertake the following steps:

- Develop standardized affidavit forms for RTA Section 54 compensation verification, with clear instructions and examples;
- Update application forms and procedures to incorporate the sworn affidavit requirement;
- Conduct outreach to landlords and property managers to communicate changes and clarify RTA obligations;
- Continue efforts to obtain updated N13 and N12 data from Tribunals Ontario through Freedom of Information requests;

- Update the Tenant Information Package in consultation with tenant advocacy organizations and as detailed in Section 3.1 of this report;
- Monitor application volumes, compliance rates, and tenant return rates over the next 12 months; and,
- Report back to the Community and Protective Services Committee in Q2 2027 with updated data, analysis of amendment effectiveness, and any additional recommendations.

#### **4.0 Financial Impact/Considerations**

There are no anticipated financial impacts at this time. The proposed amendments can be implemented using existing staff resources as they represent small changes to the existing process.

### **Conclusion**

The first year of the City of London's Rental Unit Repair Licence program under Schedule 23 of the Business Licensing By-law suggests that London's licensing regime is creating transparency and accountability in the renovation eviction process. The requirement for professional reports, building permits, and delivery of the Tenant Information Package help verify that N13 Notices are being used for legitimate renovation purposes. However, obtaining comprehensive, up-to-date data on N12 and N13 Notices from the Ontario Tribunals Landlord and Tenant Board has proven difficult. As such, a letter from the Mayor and City Clerk, on behalf of Municipal Council, to the Chair of Tribunals Ontario requesting a data sharing relationship will be beneficial for Civic Administration's efforts to obtain accurate data and make well informed improvements.

Despite lacking up-to-date N13 data, there are still ways the Rental Unit Repair Licence program can be updated to improve support for displaced tenants and dissuade bad-faith renovation evictions. Currently, the licensing process creates transparency about when N13s are issued but does not verify that tenants' RTA rights are being respected throughout the displacement process. By requiring a sworn affidavit regarding RTA Section 54 compensation, improving tenant information about RTA compensation and warning signs of pressure tactics, and extending the licence term to align with Toronto and Hamilton, the City can strengthen protections for tenants while supporting a more transparent and accountable licensing process.

The recommended amendments and updates to the Tenant Information Package maintain London's approach of avoiding direct municipal compensation obligations while strengthening enforcement of landlords' existing RTA obligations. Ongoing monitoring and data collection will be essential to assessing whether these amendments achieve their intended objectives. Civic Administration will continue collaborating with tenant advocacy organizations, landlord associations, and other municipalities to share best practices and refine London's approach. With provincial amendments to the RTA under Bill 97 still not in force, municipal licensing programs remain a key tool for protecting tenants from bad-faith renovation evictions and ensuring that Ontario's rental housing stock is maintained without unnecessary displacement of vulnerable residents.

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**CC: Lynn Marshall, Legal Counsel II, City Solicitor's Office**

Appendix A: By-law Amendment to Schedule 23 "Rental Unit Repair" of the Business Licensing By-law - L.-131-16

Appendix B: Ontario Renovation Eviction By-laws – Comparative Analysis

## Appendix A:

Bill No. ##

By-law No. L.-131-16-

A by-law to amend By-law L.-131-16 being "A by-law to licence and regulate various businesses in the City of London." with respect to Schedule 23, - Rental Unit Repair.

**WHEREAS** subsection 5(3) of the *Municipal Act, 2001* provides that a municipal power shall be exercised by by-law.

**AND WHEREAS** section 8 of the *Municipal Act, 2001* states that the powers of a municipality shall be interpreted broadly so as to confer broad authority on the municipality to enable the municipality to govern its affairs as it considers appropriate and to enhance the municipality's ability to respond to municipal issues;

**AND WHEREAS** section 151(1) of the *Municipal Act, 2001* authorizes a municipality to impose conditions as a requirement of obtaining, continuing to hold, or renewing a licence;

**AND WHEREAS** the Municipal Council of The Corporation of the City of London enacted By-law L.-131-16, including Schedule 23 - Rental Unit Repair Licence, which came into force on March 1, 2025;

**NOW THEREFORE** the Municipal Council of The Corporation of the City of London enacts as follows:

1. Schedule 23 is amended by **adding** the following new section after Section 4.4:

### **4.5 Conditions to Hold a Licence**

In addition to all of the requirements set out in this By-law, every holder of a Rental Unit Repair Licence is subject to the following conditions of continuing to hold a licence:

(a) where the Landlord is required to provide compensation to a Tenant pursuant to Section 54 of the Residential Tenancies Act, 2006, the Landlord shall, within 5 days of the triggering of such requirement, provide the Licence Manager with a sworn affidavit from the Landlord in the form prescribed by the Licence Manager setting out:

(1) the specific subsection of Section 54 of the Residential Tenancies Act, 2006 that applies to the tenancy;

(2) the amount and type of compensation required under the applicable subsection (monetary payment and/or offer of alternate rental unit);

(3) whether the required compensation has been paid, offered, or arranged, including all of the following:

i) if monetary payment is required, the date(s) payment was made or will be made, the amount(s), and the method of payment;

ii) if an alternate rental unit has been offered, the address of the alternate unit, the rent amount, the number of bedrooms, and written confirmation from the Tenant that the alternate unit is acceptable;

iii) if the required compensation has not yet been provided at the time of application, a statement of when the compensation will be provided and acknowledgment that the Licence may be subject to conditions requiring proof of compensation before the Tenant vacates the Rental Unit;

iv) a declaration that all information provided is true and accurate, acknowledging that providing false information in a sworn affidavit may result in penalties under the Criminal Code of Canada in addition to penalties under this By-law.

**2.** Section 5.9 - Licence Expiration - of Schedule 23 is amended by **deleting** the existing section and replacing it with the following:

A licence issued under this By-law shall be valid for a period of one year from the date of issuance. If after one year the Rental Unit is not ready for occupancy, the licence expires. The Landlord may apply for a licence renewal in accordance with Section 4.0 of this By-law.

**3.** Schedule 23 is amended by **adding** the following new section after Section 6.8:

#### **6.9 Failure to Provide Required RTA Compensation**

No Landlord who holds a Rental Unit Repair Licence shall fail to provide the compensation required under Section 54 of the Residential Tenancies Act, 2006, as set out in the sworn affidavit submitted with the licence application.

**4.** This by-law comes into force and effect on the day it is passed, subject to the provisions of PART VI.1 of the *Municipal Act, 2001*.

PASSED in Open Council on [DATE], 2026, subject to the provisions of PART VI.1 of the *Municipal Act, 2001*.

Josh Morgan Mayor

Michael Schulthess City Clerk

First Reading – April 28, 2026

Second Reading – April 28, 2026

Third Reading – April 28, 2026

## Appendix B:

<b>Regulatory Element</b>	<b>London</b>	<b>Toronto</b>	<b>Hamilton</b>
<b>Application Timeline</b>	7 days after N13 issuance	7 days after N13 issuance	7 days after N13 issuance
<b>Professional Report Required</b>	Yes - Licensed Architect or Engineer	Yes - Qualified Person	Yes - Engineer or qualified person
<b>Building Permit Required</b>	Yes - before application	Yes - before application	Yes - before application
<b>Tenant Information Delivery</b>	Required with N13	Posted on unit door	Required with N13
<b>Moving Expense Compensation</b>	No municipal requirement	\$1,500 ( $\leq$ 1BR) / \$2,500 (2+BR)	Not specified in by-law
<b>Monthly Rent Gap Payment</b>	No municipal requirement	Yes - current vs market rent	Yes, OR temporary accommodation
<b>Lump Sum if Not Returning</b>	No municipal requirement	3 month rent gap	Not specified
<b>Temporary Accommodation</b>	No municipal requirement	Required OR compensation	Required OR compensation
<b>Licence Term</b>	180 days	12 months	One year or completion
<b>Licence Renewal Process</b>	Evidence of delay required	New application	New application
<b>Posted Notice Requirements</b>	Application + Licence	Information Notice + Licence	Application + Licence
<b>First Offence Fine (Individual)</b>	\$1,000-\$2,500 AMPS	\$100,000 maximum	\$10,000 maximum
<b>Corporate Penalty</b>	Same as individual	\$100,000 + daily fines	\$50,000-\$100,000
<b>Public Registry</b>	No	Yes - Building Application Status Tool	No
<b>Bylaw Into Force</b>	March 3, 2025	July 31, 2025	January 1, 2025
<b>Licence Applications</b>	7	6	7